MEMORANDUM

TO: Interested Parties / Applicant

FROM: John B. Chavez, Administrator
Office of Environmental Services
City of Indianapolis

SUBJECT: Notice of Decision - **Approval**
Title V No. T097-5458-00020

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, within fifteen (15) days from the date of receipt of this notice. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing: (1) The date the document is delivered to the Office of Environmental Adjudication (OEA), (2) The date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail. (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and the following: (1) the name and address of the person making the request; (2) the interest of the person making the request; (3) identification of any persons represented by the person making the request; (4) the reasons, with particularity, for the request; (5) the issues, with particularity, proposed for consideration at any hearing; (6) identification of the terms and conditions which, in the judgement of the person making the request, would e appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to IC 4-21.5-3-5(d), the Office of Environmental Adjudication will provide you with notice of any prehearing conferences, preliminary hearing, hearings, stays, or orders disposing of the review of this decision if a written request is submitted to the Office of Environmental Adjudication at the above address. If you have procedural or scheduling questions regarding your petition, you may contact the Office of Environmental Adjudication at 317-232-8591. If you have any other questions regarding the enclosed document, please contact the Office of Environmental Services (OES) at 317-327-2234.

PART 70 OPERATING PERMIT

INDIANA DEPARTMENT of ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

and

CITY of INDIANAPOLIS OFFICE of ENVIRONMENTAL SERVICES

Cargill Dry Corn Ingredients, Inc.
1730 West Michigan Street
Indianapolis, Indiana 46222-3898

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17 and the Code of Indianapolis and Marion County, Chapter 511.

Operation Permit No.: T097-5458-00020	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality John B. Chavez Administrator, OES	Issuance Date: March 17, 2003 Expiration Date: March 17, 2008

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a dry corn milling and processing plant.

Responsible Official:	Mike Van Houten, Plant Manager
Source Address:	1730 West Michigan Street, Indianapolis, Indiana 46222-3898
Mailing Address:	1730 West Michigan Street, Indianapolis, Indiana 46222-3898
SIC Code:	2041
County Location:	Marion
County Status:	Nonattainment for Particulate Matter Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Cleaver Brooks Boiler #1 identified as Emission Unit ID 19, installed in 1972, has a rated heat input capacity of 33.5 million Btu per hour. The boiler combusts primarily natural gas and has No. 2 fuel oil as a backup capability. Emission Unit ID 19 exhausts at Stack/Vent 1.

(b) Grain receiving operations, identified as D-20. Installed in 1974. The grain receiving operation has a maximum throughput capacity of 200 tons of grain per hour, and is controlled by a baghouse, exhausting at one (1) stack, identified as Stack/Vent 8.

(c) Two (2) grain elevator headhouses, identified as D-11 and D-14. Installed in 1974. Each headhouse has a maximum throughput capacity of 200 tons of grain per hour, and each has cyclone control. Each exhausts at one (1) stack, identified as Stack/Vent 5 and 6, respectively.

(d) New mill drying and cooling operations, identified as D-6 (New Mill Dryer), D-7 (New Mill Dryer), D-8 (New Mill Cooler) and D-15 (Oil Mill Dust System). Installed in 1974. D-6 and D-7 each have a maximum throughput capacity of 25 tons per hour. D-8 has a maximum throughput capacity of 50 tons per hour. D-15 has a maximum throughput capacity of 1.5 tons per hour. Each of these processes is controlled by two cyclones in series. Each operation D-6, D-7, D-8 and D-15 exhaust out one (1) stack identified as Stack/Vent identification 2, 3, 4 and 7, respectively.

(e) Masa corn products drying operations, identified as D-15A (Masa “A” System) and D-15B (Masa “B” System). Installed in 1992. D-15A and D-15B each have a maximum throughput capacity of 6.5 tons per hour. Each of these processes is controlled by two cyclones in series. Each operation exhausts out one (1) stack identified as Stack/Vent 7A and 7B, respectively.

(f) Flaking Grit Drying identified as D-5 and consisting of two dryers. Installed in 1998. The

flaking grit drying has a maximum throughput capacity of 2.5 tons per hour and is equipped with a cyclone exhausting at a single stack identified as Stack/Vent 2.

(g) Two (2) grading systems: Grading system A, with pneumatic conveyance system exhausts identified as D-21, D-22, and D-23, and Grading system B, with pneumatic conveyance system exhausts identified as D-24, D-25, and D-26. Installed in 1974. Grading systems A and B each have a combined maximum throughput capacity of 30 tons of grain per hour. Each pneumatic conveyance system exhaust is equipped with one (1) stack, identified, as Stack/Vent 9, 10, and 11, respectively for grading system A, and Stack/Vent 12, 13, and 14, respectively for grading System B. Each exhaust has baghouse control.

(h) Germ Recovery System, identified as D-30 and D-31. Installed in 1974. Each recovery system has a maximum throughput capacity of 2.5 tons per hour and equipped with common baghouse control exhausting through two (2) stacks identified as Stack/Vent 17 and 18.

(i) One (1) Finished Products System, identified as D-37. Installed in 1974. The finished products system has a maximum throughput capacity of 33 tons of corn products per hour, and is equipped with baghouse control, exhausting through a single stack, identified as Stack/Vent 24.

(j) Masa Hammermill Dust System identified as D-50. Installed in 1999. The Masa Hammermill Dust System consists of two (2) hammermills with a combined maximum throughput capacity of 15.0 tons per hour and is equipped with a baghouse exhausting at Stack/Vent D-50.

(k) 9th Floor Filter Reroute, identified as D-52. Installed in 1999. This process has a maximum throughput capacity of 4.5 tons per hour and is controlled by a baghouse exhausting at Stack/Vent D-52.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Masa “B” Cooling, identified as D-4 with a maximum throughput capacity of 7.5 tons per hour and exhausts through a baghouse integral to the process and to Stack/Vent D-4. Installed in 1998. [326 IAC 6-1-2(a)]

(b) One (1) Feed Hammermill Lift system, identified as D-27. Installed in 1974. The feed hammermill has a maximum throughput capacity of 28 tons of corn products per hour, and exhausts through three (3) baghouses to a single stack, identified as Stack/Vent 27. These baghouses are considered integral to the process. [326 IAC 6-1-2(a)]

(c) Reduction System A, identified as D-28 and Reduction System B, identified as D-29. Installed in 1974. Each system is rated at a maximum throughput capacity of 12.5 tons per hour and exhausts through a baghouse considered integral to the process and to, respectively, Stack/Vent 15 and Stack/Vent 16. [326 IAC 6-1-2(a)]

(d) Coarse Grit Receiver, identified as D-32 and Brewers Grit Receiver, identified as D-33. Installed in 1974. Each is rated at a maximum throughput capacity of 6.25 tons per hour and exhausts through a baghouse integral to the process and to, respectively, Stack/Vent 19 and Stack/Vent 20. [326 IAC 6-1-2(a)]

(e) Two (2) Flour Receivers, identified as D-34 and D-35, one (1) Granulated Meal Receiver, identified as D-36 and one (1) Soft Meal Receiver, identified as D-38. Installed in 1974. Each is rated at a maximum throughput capacity of 5.0 tons per hour and exhausts through

a baghouse integral to the process and to, respectively, Stack/Vent 21, 22, 23 and 25. [326 IAC 6-1-2(a)]

(f) Reduction systems A and B blowers, identified as D-39. Installed in 1974. The reduction systems A and B have a maximum throughput capacity of 12 tons of corn products per hour, and are equipped with baghouse control, exhausting through a single stack, identified as Stack/Vent 26. This baghouse is considered integral to the process. [326 IAC 6-1-2(a)]

(g) Germ Recovery System Blower, identified as D-40 and rated at a maximum throughput capacity of 6.0 tons per hour and exhausting through a baghouse integral to the process and to Stack/Vent 45. Installed in 1974. [326 IAC 6-1-2(a)]

(h) Two (2) Germ Recovery System Feed Blowers, identified as D-41 and D-42 each with a maximum throughput capacity of 8.0 tons per hour and each system exhausts through four (4) baghouses in parallel and integral to the process and exhausting, respectively, through Stack/Vent 28 and 29. Installed in 1974. [326 IAC 6-1-2(a)]

(i) Joshi Dryer, identified as D-54 with a maximum throughput capacity of 2.0 tons per hour and exhausting through one (1) baghouse integral to the process and to Stack/Vent D-54. Installed in 1997. [326 IAC 6-1-2(a)]

(j) Joshi Dry Product Transfer Exhaust, identified as D-55. Installed in 1997. This process is controlled by a baghouse and has a maximum throughput capacity of 2.0 tons per hour. This baghouse is considered integral to the process and exhausts to Stack/Vent D-55. [326 IAC 6-1-2(a)]

(k) Railcar Load out of finished products, identified as D-43, D-44, 44a, 45, 46, and 46A. Installed in 1974. Flour load out and yellow goods loadout are controlled by spout extensions and loadout enclosures only. The D-43 operations have maximum throughput capacity of 25 tons per hour and D-44, 44a, 45, 46 and 46a operations have a combined maximum throughput capacity of 26 tons per hour. [326 IAC 6-1-2(a)]

(l) Finished Products Shipping and Handling Operations, including feed loadout, identified as D-47. Installed in 1974. Feed loadout is controlled by a spout extension only. The operations have maximum throughput capacity of 60 tons per hour. [326 IAC 6-1-2(a)]

(m) Corn Aspiration identified as Emission Unit ID D-48 and controlled by a baghouse exhausting less than 4000 acfm at Stack/Vent D-48. Installed in 1995. [326 IAC 6-1-2(a)]

(n) Masa Cooker Steam Ventilation Unit identified as Emission Unit ID D-49 and controlled by a cyclone exhausting at Stack/Vent D-49. Installed in 1996. [326 IAC 6-1-2(a)]

(o) Raw Bran Bin Dust Filter identified as Emission Unit ID D-53 and controlled by a baghouse exhausting at Stack/Vent D-53. Installed in 1997. [326 IAC 6-1-2(a)]

(p) Natural gas-fired heaters, each rated at less than 10 million Btu per hour; [326 IAC 6-1-2(a)]

(q) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour; [326 IAC 6-1-2(a)]

(r) Brazing equipment, cutting torches, soldering equipment, and welding equipment, not resulting in the emission of HAPs; [326 IAC 6-1-2(a)]

(s) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including deburring, buffing, polishing, abrasive blasting,

pneumatic conveying, and woodworking operations. [326 IAC 6-1-2(a)]

(t) Cleaners and solvents having a vapor pressure equal to or less than 2 kiloPascals measured at 38 degrees Celsius (100 degrees Fahrenheit) or having a vapor pressure equal to or less than 0.7 kiloPascals measured at 20 degrees Celsius, the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months; [326 IAC 8-3-5(a) & (b)]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

(a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM , the Indianapolis Office of Environmental Services (OES), the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) The IAPCB has adopted by reference state rules listed in Attachment A of this permit. The version adopted by reference includes all amendments, additions and repeals filed with the Secretary of State through August 10, 1997 and published in the Indiana Register September 1, 1997, unless otherwise indicated in the adoption by reference. For the purposes of this permit, all state rules adopted by reference by the IAPCB are enforceable by OES using local enforcement procedures. Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)][326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue

Indianapolis, Indiana 46221

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ and OES, within a reasonable time, any information that IDEM, OAQ and OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and OES copies of records required to be kept by this permit.

(c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit,

including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and OES on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ and OES may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and

repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air QUALITY
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and OES. IDEM, OAQ and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and OES within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air QUALITY, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, and OES may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, and OES by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, or OES shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or OES has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or OES has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, or OES determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, or OES to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or OES may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and OES and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and OES on or before the date it is due.

(2) If IDEM, OAQ and OES, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ and OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and OES, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ and OES fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for

changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and OES in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, OES, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the

Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ and OES within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, or OES, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute, rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18][40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Enforcement Section, Asbestos Program
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct an that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR

63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ and OES of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and OES if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in the permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance

2700 South Belmont Avenue
Indianapolis, Indiana 46221

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of pressure drop, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on September 22, 1988.

(b) Upon direct notification by IDEM, OAQ and OES that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a

certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Response Plan - Preparation, Implementation, Records and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such an additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, IDEM, OAQ and OES shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal and the results of the actions taken up to the time of the notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable response steps in response to a compliance monitoring condition, it the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Condition B - Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by annual April 15th of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and OES on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner OES within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(c) Unless otherwise specified in this permit, any notice, report, or other submission required

by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Cleaver Brooks Boiler #1 identified as Emission Unit ID 19, installed in 1972, has a rated heat input capacity of 33.5 million Btu per hour. The boiler combusts primarily natural gas and has No. 2 fuel oil as a backup capability. Emission Unit ID 19 exhausts at Stack/Vent 1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Nonattainment Area Limitations: Marion County [326 IAC 6-1-12]

Pursuant to 326 IAC 6-1-12 (Nonattainment Area Limitations: Marion County), particulate matter (PM) emissions from the Cleaver Brooks Boiler #1 identified as Emission Unit ID 19 are limited to 0.014 pounds per million Btu and 1.0 tons per year.

D.1.2 Fuel Usage Limitation [326 IAC 6-1-12]

(a) Natural Gas combustion (by itself with no other fuel burned) in Emission Unit ID 19 shall not exceed 263.15 million cubic feet per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is equivalent to 1.0 ton per year of PM.

(b) Distillate Fuel combustion (by itself with no other fuel burned) in Emission Unit ID 19 shall not exceed 1000 kgal per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is equivalent to 1.0 ton per year of PM.

(c) For the purposes of determining compliance, every 1000 gallons (1 kgal) of distillate fuel consumption is equivalent to 0.26 million cubic feet of natural gas consumption based on PM emissions. This usage limit is required to limit the potential to emit PM to less than 1.0 tons per year.

D.1.3 Sulfur Dioxide [326 IAC 7-1.1][326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from Emission Unit ID 19 shall not exceed five tenths (0.5) pounds per million Btu heat input for distillate oil combustion. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID 19 and any control devices.

Compliance Determination Requirements

D.1.5 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 3-7-4]

Compliance with Condition D.1.3 shall be determined utilizing one of the following options.

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths percent (0.5) pounds per million Btu heat input by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a certification;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the

procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Visible Emissions Notations

(a) Visible emission notations of Stack/Vent 1 stack exhaust shall be performed once per shift during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.7 Record Keeping Requirements

(a) To document compliance with condition D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) below shall be complete and sufficient to establish compliance with the SO_2 emission limit established in Condition D.1.3.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since the last compliance determination period and equivalent sulfur dioxide emissions;

(3) To certify compliance when burning natural gas only, the permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a

minimum shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records of monthly and twelve (12) consecutive month sum of natural gas consumption and/or natural gas equivalents for Emission Unit ID 19 (Boiler # 1).

(c) To document compliance with Condition D.1.6, the Permittee shall maintain records of once per shift visible emission notations of the stack exhaust from Stack/Vent 1 while combusting fuel oil.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

(a) A certification, signed by the responsible official, that certifies all of the fuels combusted during the period. The natural gas fired boiler certification does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) The natural gas boiler certification shall be submitted to the address(es) listed in Section C - General Reporting Requirements of this permit using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported.

(c) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(b) Grain receiving operations, identified as D-20. Installed in 1974. The grain receiving operation has a maximum throughput capacity of 200 tons of grain per hour, and is controlled by a baghouse, exhausting at one (1) stack, identified as Stack/Vent 8.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Nonattainment Area Limitations [326 IAC 6-1-2(d)(1)]

Pursuant to 326 IAC 6-1-2(d)(1) (Nonattainment Area Limitations), particulate matter (PM) emissions from grain receiving operations shall be limited to 0.03 grains per dry standard cubic foot of exhaust air. The baghouse for particulate matter control shall be in operation at all times when grain receiving is in operation in order to comply with this limit.

D.2.2 Nonattainment Area Limitations [326 IAC 6-1-2(d)(2)]

Pursuant to 326 IAC 6-1-2(d)(2) (Nonattainment Area Limitations), the following shall be provided:

(a) Good housekeeping practices conducted in the following areas or operations:

(1) Areas to be swept and maintained clean in appearance shall include at a minimum: general grounds, yard and other open areas; floor decks, hopper areas, loading areas, dust collectors, and all such areas of dust or waste concentrations; and grain driers with respect to accumulated particulate matter.

(2) Cleanings or other collected waste material shall be handled and disposed of in such a manner that the area does not generate fugitive dust.

(3) Dust from driveway, access roads, and other areas of travel be controlled.

(4) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

(b) Good equipment maintenance will be those procedures which eliminate or minimize emissions from equipment or a system caused by:

(1) Malfunctions.
(2) Breakdowns.
(3) Improper adjustments.
(4) Operation above rated or designed capacity.
(5) Not following designed operating specifications.
(6) Lack of good preventive maintenance care.
(7) Lack of critical and proper spare replacement parts on hand.
(8) Lack of properly trained and experienced personnel.

(c) To ensure the above good housekeeping and maintenance procedures, emissions from the affected areas, operations, equipment and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID D-20.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations

(a) Visible emission notations of Stack/Vent 8 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the grain receiving operations, at least once per shift when grain receiving is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES shall be calibrated at least once every six (6) months.

D.2.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling D-20 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency

Provisions).

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.4, the Permittee shall maintain records of visible emission notations of the stack exhaust from Stack/Vent 8 once per shift.

(b) To document compliance with Condition D.2.5, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.

(c) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(c) Two (2) grain elevator headhouses, identified as D-11 and D-14. Installed in 1974. Each headhouse has a maximum throughput capacity of 200 tons of grain per hour, and each has - cyclone control. Emissions units D-11 and D-14 exhausts at one (1) stack each, identified as Stack/Vent 5 and 6, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Nonattainment Area Limitations: Marion County [326 IAC 6-1-12]

Pursuant to 326 IAC 6-1-12 (Nonattainment Area Limitations: Marion County), the particulate matter (PM) emissions from grain elevator headhouse operations, identified as D-11 and D- 14:

(a) shall each not exceed 0.03 grains per dry standard cubic foot of exhaust air. At an exhaust air flow rate of 5395 dscfm, this is equivalent to 1.39 pounds per hour for Emission Unit ID D-11. At an exhaust air flow rate of 7800 dscfm, this is equivalent to 2.01 pounds per hour for Emission Unit ID D-14.

(b) shall each not exceed, respectively, 3.1 and 6.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

The cyclones for particulate matter control shall be in operation at all times D-11 and D-14 are in operation in order to comply with the PM emission limit. Therefore, these conditions limit the potential to emit of PM to less than the applicable emission limit pursuant to 326 IAC 6-1-12.

D.3.2 Nonattainment Area Limitations [326 IAC 6-1-2(d)(2)]

Pursuant to 326 IAC 6-1-2(d)(2) (Nonattainment Area Limitations), the following shall be provided:

(a) Good housekeeping practices conducted in the following areas or operations:

(1) Areas to be swept and maintained clean in appearance shall include at a minimum: general grounds, yard and other open areas; floor decks, hopper areas, loading areas, dust collectors, and all such areas of dust or waste concentrations; and grain driers with respect to accumulated particulate matter.

(2) Cleanings or other collected waste material shall be handled and disposed of in such a manner that the area does not generate fugitive dust.

(3) Dust from driveway, access roads, and other areas of travel be controlled.

(4) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

(b) Good equipment maintenance will be those procedures which eliminate or minimize emissions from equipment or a system caused by:

(1) Malfunctions.
(2) Breakdowns.
(3) Improper adjustments.

(4) Operation above rated or designed capacity.
(5) Not following designed operating specifications.
(6) Lack of good preventive maintenance care.
(7) Lack of critical and proper spare replacement parts on hand.
(8) Lack of properly trained and experienced personnel.

(c) To ensure the above good housekeeping and maintenance procedures, emissions from the affected areas, operations, equipment and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID D-11 and D-14 and any control devices.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.4 Visible Emissions Notations

(a) Visible emission notations of Stack/Vent 5 and 6 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.3.5 Cyclone Inspections

An inspection shall be performed each calender quarter of all cyclones controlling headhouse operations when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.3.6 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements

(a) To document compliance with Condition D.3.4, the Permittee shall maintain records of visible emission notations of the stack exhaust from Stack/Vent 5 and 6 once per shift.

(b) To document compliance with Condition D.3.5, the Permittee shall maintain records of the results of the inspections required under Condition D.3.5 and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(d) New mill drying and cooling operations, identified as D-6 (New Mill Dryer), D-7 (New Mill Dryer), D-8 (New Mill Cooler) and D-15 (Oil Mill Dust System). Installed in 1974. D-6 and D-7 each have a maximum throughput capacity of 25 tons per hour. D-8 has a maximum throughput capacity of 50 tons per hour. D-15 has a maximum throughput capacity of 1.5 tons per hour. Each of these processes is controlled by two cyclones in series. Each operation D-6, D-7, D-8 and D-15 exhaust out one (1) stack identified as Stack/Vent identification 2, 3, 4 and 7, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Nonattainment Area Limitations: Marion County [326 IAC 6-1-12]

Pursuant to 326 IAC 6-1-12 (Nonattainment Area Limitations: Marion County), the particulate matter (PM) emissions from drying and cooling operations, identified as D-6, D-7, D-8 and D-15:

(a) shall each not exceed 0.03 grains per dry standard cubic foot of exhaust air. At an exhaust air flow rate of 10789 dscfm, this is equivalent to 2.77 pounds per hour for Emission Unit ID D-6. At an exhaust air flow rate of 8092 dscfm, this is equivalent to 2.08 pounds per hour for Emission Unit ID D-7. At an exhaust air flow rate of 10789 dscfm, this is equivalent to 2.77 pounds per hour for Emission Unit ID D-8. At an exhaust air flow rate of 9400 dscfm, this is equivalent to 2.42 pounds per hour for Emission Unit ID 15.

(b) shall each not exceed, respectively, 12.0, 9.4, 3.1 and 5.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

The cyclones for particulate matter control shall be in operation at all times D-6, D-7, D-8 and D-15 are in operation in order to comply with the PM limit. Therefore, these conditions limit the potential to emit of PM to less than the applicable emission limit pursuant to 326 IAC 6-1-12.

D.4.2 Nonattainment Area Limitations [326 IAC 6-1-2(d)(2)]

Pursuant to 326 IAC 6-1-2(d)(2) (Nonattainment Area Limitations), the following shall be provided:

(a) Good housekeeping practices conducted in the following areas or operations:

(1) Areas to be swept and maintained clean in appearance shall include at a minimum: general grounds, yard and other open areas; floor decks, hopper areas, loading areas, dust collectors, and all such areas of dust or waste concentrations; and grain driers with respect to accumulated particulate matter.

(2) Cleanings or other collected waste material shall be handled and disposed of in such a manner that the area does not generate fugitive dust.

(3) Dust from driveway, access roads, and other areas of travel be controlled.

(4) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

(b) Good equipment maintenance will be those procedures which eliminate or minimize emissions from equipment or a system caused by:

(1) Malfunctions.
(2) Breakdowns.
(3) Improper adjustments.
(4) Operation above rated or designed capacity.
(5) Not following designed operating specifications.
(6) Lack of good preventive maintenance care.
(7) Lack of critical and proper spare replacement parts on hand.
(8) Lack of properly trained and experienced personnel.

(c) To ensure the above good housekeeping and maintenance procedures, emissions from the affected areas, operations, equipment and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID D-6, D-7, D-8 and D-15 and any control devices.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.4 Visible Emissions Notations

(a) Visible emission notations of Stack/Vent 2, 3, 4 and 7 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.4.5 Cyclone Inspections

An inspection shall be performed each calender quarter of all cyclones controlling grain drying and cooling operations when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.4.6 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation

of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.7 Record Keeping Requirements

(a) To document compliance with Condition D.4.4, the Permittee shall maintain records of visible emission notations of the stack exhaust from Stack/Vent 2, 3, 4 and 7 once per shift.

(b) To document compliance with Condition D.4.5, the Permittee shall maintain records of the results of the inspections required under Condition D.4.5 and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(e) Masa corn products drying operations, identified as D-15A (Masa "A" System) and D-15B (Masa "B" System). Installed in 1992. D-15A and D-15B each have a maximum throughput capacity of 6.5 tons per hour. Each of these processes is controlled by two cyclones in series. Each operation exhausts out one (1) stack identified as Stack/Vent 7A and 7B, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-1-2(a)][Installation Permit 9200020-01]

Pursuant to Installation Permit 920020-01, particulate matter (PM) emissions from corn products drying operations, Masa "A" and "B" systems, identified as D-15A, and D-15B each shall not exceed 0.02 grains per dry standard cubic foot of exhaust air and 2.2 pounds per hour. The cyclones for particulate matter (PM) control shall be in operation at all times D-15A and D-15B are in operation in order to comply with the PM limit. Therefore, these conditions limit the potential to emit of PM to less than the applicable emission limit pursuant to 326 IAC 6-1-2(a) and Installation Permit 9200020-01 issued November 13, 1992.

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID D-15A and D-15B and any control devices.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.3 Visible Emissions Notations

(a) Visible emission notations of Stack/Vent 7A and 7B shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.5.4 Cyclone Inspections

An inspection shall be performed each calender quarter of all cyclones controlling corn products drying operations when venting to the atmosphere. A cyclone inspection shall be performed within

three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.5.5 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.6 Record Keeping Requirements

(a) To document compliance with Condition D.5.3, the Permittee shall maintain records of once per shift visible emission notations of the stack exhaust from Stack/Vent 7A and 7B.

(b) To document compliance with Condition D.5.4, the Permittee shall maintain records of the results of the inspections required under Condition D.5.4 and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.6 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(f) Flaking Grit Drying identified as D-5 and consisting of two dryers. Installed in 1998. The flaking grit drying has a maximum throughput capacity of 2.5 tons per hour and is equipped with a cyclone exhausting at a single Stack identified as Stack/Vent 2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Particulate Matter (PM) [326 IAC 6-1-2(a)][Construction Permit 970020-01]

Pursuant to Construction Permit 970020-01 issued June 17, 1997, particulate matter (PM) emissions from Emission Unit ID D-5 shall not exceed 0.015 grains per dry standard cubic foot of exhaust air. At an exhaust air flow rate of 12,000 dscfm, this is equivalent to 1.54 pounds per hour.

The cyclone for D-5 for particulate matter control shall be in operation at all times D-5 is in operation in order to comply with the PM limit. Therefore, these conditions limit the potential to emit of PM to less than the applicable emission limit pursuant to Construction Permit 970020-01 and 326 IAC 6-1-2(a).

D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID D-5, D-50 and D-52 and any control devices.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.3 Visible Emissions Notations

(a) Visible emission notations of the Stack/Vent 2 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.6.4 Cyclone Inspections

An inspection shall be performed each calender quarter of all cyclones controlling Emission Unit D-5 operations when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.6.5 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.6 Record Keeping Requirements

(a) To document compliance with Condition D.6.3, the Permittee shall maintain records of once per shift visible emission notations of the stack exhaust from Stack/Vent 2.

(b) To document compliance with Condition D.6.4, the Permittee shall maintain records of the results of the inspections required under Condition D.6.4 and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.7 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(g) Two (2) grading systems: Grading system A , with pneumatic conveyance system exhausts identified as D-21, D-22, and D-23, and Grading system B, with pneumatic conveyance system exhausts identified as D-24, D-25, and D-26. Installed in 1974. Grading systems A and B each have a combined maximum throughput capacity of 30 tons of grain per hour. Each pneumatic conveyance system exhaust is equipped with one (1) stack, identified as Stack/Vent 9, 10, and 11, respectively for grading system A, and Stack/Vent 12, 13, and 14, respectively for grading System B. Each exhaust has baghouse control.

(h) Germ Recovery System, identified as D-30 and D-31. Installed in 1974. Each recovery system has a maximum throughput capacity of 2.5 tons per hour and equipped with common baghouse control exhausting through two (2) stacks identified as Stack/Vent 17 and 18.

(i) One (1) Finished Products System, identified as D-37. Installed in 1974. The finished products system has a maximum throughput capacity of 33 tons of corn products per hour, and is equipped with baghouse control, exhausting through a single stack, identified as Stack/Vent 24.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Nonattainment Area Limitations [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Limitations), Grading system A , with pneumatic conveyance system exhausts identified as D-21, D-22, and D-23, and Grading system B, with pneumatic conveyance system exhausts identified as D-24, D-25, and D-26 each shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

The baghouses for particulate matter control shall be in operation at all times D-21, D-22, D-23, D-24, D-25, D-26, D-30, D-31 and D-37 are in operation in order to comply with the PM limit. Therefore, these conditions limit the PTE of PM to less than the applicable emission limit pursuant to 326 IAC 6-1-2(a).

D.7.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID D-21 through D-26, D-30, D-31 and D-37 and any control devices.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.7.3 Visible Emissions Notations

(a) Visible emission notations of Stack/Vent 9, 10, 11, 12, 13, 14, 17, 18 and 24 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.7.4 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with D-21, D-22, D-23, D-24, D-25, D-26, D-30, D-31 and D-37, at least once per shift when in operation and when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a violation of this permit

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES shall be calibrated at least once every six (6) months.

D.7.5 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling D-21, D-22, D-23, D-24, D-25, D-26, D-30, D-31 and D-37 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.7.6 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.7 Record Keeping Requirements

(a) To document compliance with Condition D.7.3, the Permittee shall maintain records of once per shift visible emission notations of the stack exhaust from Stack/Vent 9, 10, 11, 12,13,14, 17, 18 and 24.

(b) To document compliance with Condition D.7.4, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.

(c) To document compliance with Condition D.7.5, the Permittee shall maintain records of the results of the inspections required under Condition D.7.5 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.8 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(j) Masa Hammermill Dust System identified as D-50. Installed in 1999. The Masa Hammermill Dust System consists of two (2) hammermills with a combined maximum throughput capacity of 15.0 tons per hour and is equipped with a baghouse exhausting at Stack/Vent D-50.

(k) 9th Floor Filter Reroute, identified as D-52. Installed in 1999. This process has a maximum throughput capacity of 4.5 tons per hour and is controlled by a baghouse exhausting at Stack/Vent D-52.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Nonattainment Area Limitations [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Limitations)

(a) Particulate Matter (PM) emissions from the Masa Hammermill Dust System, identified as Emission Unit ID D-50, shall be limited to 0.03 grains per dry standard cubic foot of exhaust air. At an exhaust air flow rate of 10000 dscfm, this is equivalent to 2.57 pounds per hour of PM.

(b) Particulate Matter (PM) emissions from the 9th Floor Filter Reroute, identified as Emission Unit ID D-52, shall be limited to 0.015 grains per dry standard cubic foot of exhaust air. At an exhaust air flow rate of 36000 dscfm, this is equivalent to 4.63 pounds per hour of PM and 1.15 pounds per hour of PM10.

The baghouses for Particulate Matter (PM) control shall be in operation at all times D-50 and D-52 are in operation in order to comply with the PM limit. Therefore, these conditions limit the potential to emit of PM to less than the applicable emission limit pursuant to 326 IAC 6-1-2(a).

D.8.2 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) 40 CFR 52.21;

(a) Particulate Matter (PM) and PM10 emissions from the Masa Hammermill Dust System, identified as Emission Unit ID D-50, shall be limited to 0.03 grains per dry standard cubic foot of exhaust air. At an exhaust air flow rate of 10000 dscfm, this is equivalent to 2.57 pounds per hour of PM and 0.64 pounds per hour of PM10.

(b) Particulate Matter (PM) and PM10 emissions from the 9th Floor Filter Reroute, identified as D-52, shall be limited to 0.015 grains per dry standard cubic foot of exhaust air. At an exhaust air flow rate of 36000 dscfm, this is equivalent to 4.63 pounds per hour of PM and 1.15 pounds per hour of PM10.

(c) Particulate Matter (PM) emissions from the Masa Hammermill Dust System, identified as Emission Unit ID D-50, shall be limited to less than twenty five (25) tons per twelve consecutive month period with compliance determined at the end of each month. PM10 emissions shall be limited to less than fifteen (15) tons per twelve consecutive month period with compliance determined at the end of each month.

(d) Particulate Matter (PM) emissions from the 9th Floor Filter Reroute, identified as D-52 shall be limited to less than twenty five (25) tons per twelve consecutive month period with compliance determined at the end of each month. PM10 emissions shall be limited to less

than fifteen (15) tons per twelve consecutive month period with compliance determined at the end of each month.

The baghouses for Particulate Matter (PM) and PM10 control shall be in operation at all times D-50 and D-52 are in operation in order to comply with the PM and PM10 limits. Therefore, these conditions limit the potential to emit of PM to less than twenty five (25) tons per year and limit PM10 to less than fifteen (15) tons per year such that 326 IAC 2-2 does not apply.

D.8.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID D-50 and D-52 and any control devices.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.8.4 Visible Emissions Notations

(a) Visible emission notations of Stack/Vent D-50 and Stack/Vent D-52 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.8.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with Emission Unit ID D-50 and D-52 operations, at least once per shift when in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES shall be calibrated at least once every six (6) months.

D.8.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling D-50 and D-52 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.8.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.8.8 Record Keeping Requirements

(a) To document compliance with Condition D.8.4, the Permittee shall maintain records of visible emission notations of the stack exhaust from Stack/Vent D-50 and Stack/Vent D-52 once per shift.

(b) To document compliance with Condition D.8.5, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.

(c) To document compliance with Condition D.8.6, the Permittee shall maintain records of the results of the inspections required under Condition D.8.6 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.9 FACILITY OPERATION CONDITIONS

INSIGNIFICANT ACTIVITIES - EMISSION UNITS WITH INTEGRAL CONTROLS

Facility Description [326 IAC 2-7-5(15)]:

(a) Masa "B" Cooling, identified as D-4 with a maximum throughput capacity of 7.5 tons per hour and exhausts through a baghouse integral to the process and to Stack/Vent D-4. Installed in 1998. [326 IAC 6-1-2(a)]

(b) One (1) Feed Hammermill Lift system, identified as D-27. Installed in 1974. The feed hammermill has a maximum throughput capacity of 28 tons of corn products per hour, and exhausts through three (3) baghouses to a single stack, identified as Stack/Vent 27. These baghouses are considered integral to the process. [326 IAC 6-1-2(a)]

(c) Reduction System A, identified as D-28 and Reduction System B, identified as D-29. Installed in 1974. Each system is rated at a maximum throughput capacity of 12.5 tons per hour and exhausts through a baghouse considered integral to the process and to, respectively, Stack/Vent 15 and Stack/Vent 16. [326 IAC 6-1-2(a)]

(d) Coarse Grit Receiver, identified as D-32 and Brewers Grit Receiver, identified as D-33. Installed in 1974. Each is rated at a maximum throughput capacity of 6.25 tons per hour and exhausts through a baghouse integral to the process and to, respectively, Stack/Vent 19 and Stack/Vent 20. [326 IAC 6-1-2(a)]

(e) Two (2) Flour Receivers, identified as D-34 and D-35, one (1) Granulated Meal Receiver, identified as D-36 and one (1) Soft Meal Receiver, identified as D-38. Installed in 1974. Each is rated at a maximum throughput capacity of 5.0 tons per hour and exhausts through a baghouse integral to the process and to, respectively, Stack/Vent 21, 22, 23 and 25. [326 IAC 6-1-2(a)]

(f) Reduction systems A and B blowers, identified as D-39. Installed in 1974. The reduction systems A and B have a maximum throughput capacity of 12 tons of corn products per hour, and are equipped with baghouse control, exhausting through a single stack, identified as Stack/Vent 26. This baghouse is considered integral to the process. [326 IAC 6-1-2(a)]

(g) Germ Recovery System Blower, identified as D-40 and rated at a maximum throughput capacity of 6.0 tons per hour and exhausting through a baghouse integral to the process and to Stack/Vent 45. Installed in 1974. [326 IAC 6-1-2(a)]

(h) Two (2) Germ Recovery System Feed Blowers, identified as D-41 and D-42 each with a maximum throughput capacity of 8.0 tons per hour and each system exhausts through four (4) baghouses in parallel and integral to the process and exhausting, respectively, through Stack/Vent 28 and 29. Installed in 1974. [326 IAC 6-1-2(a)]

(i) Joshi Dryer, identified as D-54 with a maximum throughput capacity of 2.0 tons per hour and exhausting through one (1) baghouse integral to the process and to Stack/Vent D-54. Installed in 1997. [326 IAC 6-1-2(a)]

(j) Joshi Dry Product Transfer Exhaust, identified as D-55. Installed in 1997. This process is controlled by a baghouse and has a maximum throughput capacity of 2.0 tons per hour. This baghouse is considered integral to the process and exhausts to Stack/Vent D-55. [326 IAC 6-1-2(a)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.9.1 Nonattainment Area Limitations [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Limitations), particulate matter (PM) emissions from Emission Unit ID D-4, D-27, D-28, D-29, D-32, D-33, D-34, D-35, D-36 D-38, D-39, D-40, D-41, D-42, D-54 and D-55 each shall not exceed 0.03 grains per dry standard cubic foot of exhaust air. Each baghouse for particulate matter control shall be in operation at all times when its corresponding emission unit is in operation. Compliance with this condition will satisfy the requirements of 326 IAC 6-1-2(a).

SECTION D.10 FACILITY OPERATION CONDITIONS

INSIGNIFICANT ACTIVITIES - LOAD OUT EMISSION UNITS

Facility Description [326 IAC 2-7-5(15)]

(k) Railcar Load out of finished products, identified as D-43, D-44, 44a, 45, 46, and 46A. Installed in 1974. Flour load out and yellow goods loadout are controlled by spout extensions and loadout enclosures only. The D-43 operations have maximum throughput capacity of 25 tons per hour and D-44, 44a, 45, 46 and 46a operations have a combined maximum throughput capacity of 26 tons per hour. [326 IAC 6-1-2(a)]

(l) Finished Products Shipping and Handling Operations, including feed loadout, identified as D-47. Installed in 1974. Feed loadout is controlled by a spout extension only. The operations have maximum throughput capacity of 60 tons per hour. [326 IAC 6-1-2(a)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.10.1 Nonattainment Area Limitations [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Limitations), particulate matter (PM) emissions from Emission Unit ID D-43, D-44, 44a, 45, 46, 46A and D-47 each shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

SECTION D.11 INSIGNIFICANT ACTIVITIES

Facility Description [326 IAC 2-7-5(15)]

(m) Corn Aspiration identified as Emission Unit ID D-48 and controlled by a baghouse exhausting less than 4000 acfm at Stack/Vent D-48. Installed in 1995. [326 IAC 6-1-2(a)]

(n) Masa Cooker Steam Ventilation Unit identified as Emission Unit ID D-49 and controlled by a cyclone exhausting at Stack/Vent D-49. Installed in 1996. [326 IAC 6-1-2(a)]

(o) Raw Bran Bin Dust Filter identified as Emission Unit ID D-53 and controlled by a baghouse exhausting at Stack/Vent D-53. Installed in 1997. [326 IAC 6-1-2(a)]

(p) Natural gas-fired heaters, each rated at less than 10 million Btu per hour; [326 IAC 6-1-2(a)]

(q) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour; [326 IAC 6-1-2(a)]

(r) Brazing equipment, cutting torches, soldering equipment, and welding equipment, not resulting in the emission of HAPs; [326 IAC 6-1-2(a)]

(s) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. [326 IAC 6-1-2(a)]

(t) Cleaners and solvents having a vapor pressure equal to or less than 2 kiloPascals measured at 38 degrees Celsius (100 degrees Fahrenheit) or having a vapor pressure equal to or less than 0.7 kiloPascals measured at 20 degrees Celsius, the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months; [326 IAC 8-3-5(a) & (b)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.11.1 Nonattainment Area Limitations [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Limitations);

(a) Particulate Matter (PM) emissions from Emission Unit ID D-48, D-49 and D-53 each shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

(b) Particulate Matter (PM) emissions from natural gas-fired heaters, each rated at less than 10 million Btu per hour, equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, brazing equipment, cutting torches, soldering equipment, and welding equipment, not resulting in the emission of HAPs and grinding and machining operations each shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

D.11.2 Volatile Organic Compounds (VOCs) [326 IAC 8-3-5(a)]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs existing as of July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs existing as of July 1, 1990, the Permittee shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
and
CITY of INDIANAPOLIS OFFICE of ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Cargill Dry Corn Ingredients, Inc.
Source Address: 1730 West Michigan Street, Indianapolis, Indiana, 46222-3898
Mailing Address: 1730 West Michigan Street, Indianapolis, Indiana, 46222-3898
Part 70 Permit No.: 097-5458-00020

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967
and
CITY of INDIANAPOLIS OFFICE of ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE
2700 South Belmont Ave.
Indianapolis Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Cargill Dry Corn Ingredients, Inc.
Source Address: 1730 West Michigan Street, Indianapolis, Indiana, 46222-3898
Mailing Address: 1730 West Michigan Street, Indianapolis, Indiana, 46222-3898
Part 70 Permit No.: 097-5458-00020

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air QUALITY (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice or within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY of INDIANAPOLIS OFFICE of ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE

PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Cargill Dry Corn Ingredients, Inc.
Source Address: 1730 West Michigan Street, Indianapolis, Indiana, 46222-3898
Mailing Address: 1730 West Michigan Street, Indianapolis, Indiana, 46222-3898
Part 70 Permit No.: 097-5458-00020

9	Natural Gas Only
9	Alternate Fuel burned From:_____ To:_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY of INDIANAPOLIS OFFICE of ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT

Source Name: Cargill Dry Corn Ingredients, Inc.
Source Address: 1730 West Michigan Street, Indianapolis, Indiana, 46222-3898
Mailing Address: 1730 West Michigan Street, Indianapolis, Indiana, 46222-3898
Part 70 Permit No.: 097-5458-00020

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY of INDIANAPOLIS OFFICE of ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE

Part 70 Usage Report
(Submit Report Quarterly)

Source Name: Cargill Dry Corn Ingredients, Inc.
Source Address: 1730 West Michigan Street, Indianapolis, Indiana, 46222-3898
Mailing Address: 1730 West Michigan Street, Indianapolis, Indiana, 46222-3898
Part 70 Permit No.: 097-5458-00020
Facility: Boiler 19
Parameter: Natural Gas and Natural Gas Equivalent usage
Limit: 263.15 MMCF per twelve (12) consecutive month period with compliance determined at the end of each month. 1.0 kgal of distillate fuel usage is equivalent to 0.26MMCF of Natural Gas usage

Quarter:_____ Year:_____

	Column 1	Column 2	Column 3
	Total natural gas usage this month	Total fuel oil use equivalents this month	Rolling twelve consecutive month period combined natural gas and equivalents usage
Month			
Month			
Month			

9 No deviation occurred in this month.
9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____
Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Attachment A

The following state rule have been adopted by reference by the Indianapolis Air Pollution Control Board and are enforceable by Indianapolis Office of Environmental Services (OES) using local enforcement procedures.

(1) 326 IAC 1-1-1 through 1-1-3 and 1-1-5;
(2) 326 IAC 1-2-1 through 1-2-91 (In addition, the IAPCB has adopted several local definitions);
(3) 326 IAC 1-3-1 through 1-3-4;
(4) 326 IAC 1-4-1 (The IAPCB added to the adoption by reference a citation to 61 FR 58482 (November 15, 1996));
(5) 326 IAC 1-5-1 through 1-5-5;
(6) 326 IAC 1-6-1 through 1-6-6;
(7) 326 IAC 1-7-1 through 1-7-5
(8) 326 IAC 2-3-1 through 2-3-5;
(9) 326 IAC 2-4-1 through 2-4-6;
(10) 326 IAC 2-6-1 through 2-6-4;
(11) 326 IAC 2-7-1 through 2-7-18, 2-7-20 through 2-7-25;
(12) 326 IAC 2-8-1 through 2-8-15, 2-8-17 through 2-8-10;
(13) 326 IAC 2-9-1 through 2-9-14;
(14) 326 IAC 2-10-1 through 2-10-5 (The IAPCB adoption adds the language “state or local” immediately after the word “federal” in 326 IAC 2-10-1);
(15) 326 IAC 2-11-1, 2-11-3 and 2-11-4 (The IAPCB adoption adds the language “federal, state or local” immediately after the word “by” in 326 IAC 2-11-1);
(16) 326 IAC 3-1.1-1 through 3-1.1-5;
(17) 326 IAC 3-2.1-1 through 3-2.1-5;
(18) 326 IAC 3-3-1 through 3-3-5;
(19) 326 IAC 4-2-1 through 4-2-2;
(20) 326 IAC 5-1-1 (a), (b) and c) (5), 5-1-2 (1), (2)(A), (2)c) (4), 5-1-3 through 5-1-5, 5-1-7;
(21) 326 IAC 7-1.1-1 and 7-1.1-2;
(22) 326 IAC 7-2-1;
(23) 326 IAC 7-3-1 and 7-3-2;
(24) 326 IAC 7-4-2(28) through (31) (Instead of adopting by reference 7-4-2(1) through (27), the IAPCB regulation substitutes the same requirements listed in a format in which the companies are alphabetized and emission points known to no longer exist have been deleted);
(25) 326 IAC 8-1-0.5 except (b), 8-1-1 through 8-1-2, 8-1-3 except c), (g) and (i), 8-1-5 through 8-1-12;
(26) 326 IAC 8-2-1 through 8-2-12 (The IAPCB adoption by reference of 8-2- 5 adds additional language specific to Zimmer Paper Products, Incorporated as subpart c);
(27) 326 IAC 8-3-1 through 8-3-7;
(28) 326 IAC 8-4-1 through 8-4-5, 8-4-6 (a)(6), (a)(8) and (a)(14) and 8-4-6(b)(1), (b)(3) and 8-4-6c) (In place of 8-4-6(b)(2), which was not adopted, the IAPCB adopted language requiring a pressure relief valve set to release at no less than four and eight-tenths (4.8) Kilo Pascals (seven-tenths (0.7) pounds per square inch)), 8-4-7 except (e), 8-4-8 and 8-4-9;
(29) 326 IAC 8-5-1 through 8-5-4, 8-5-5 except (a)(3) and (d)(3);
(30) 326 IAC 8-6-1 and 8-6-2;
(31) 326 IAC 9-1-1 and 9-1-2;
(32) 326 IAC 11-1-1 through 11-1-2;
(33) 326 IAC 11-2-1 through 11-2-3;
(34) 326 IAC 11-3-1 through 11-3-6;
(35) 326 IAC 14-1-1 through 14-1-4;

Attachment A continued

(36) 326 IAC 14-2-1 except 40 CFR 61.145;
(37) 326 IAC 14-3-1;
(38) 326 IAC 14-4-1;
(39) 326 IAC 14-5-1;
(40) 326 IAC 14-6-1;
(41) 326 IAC 14-7-1;
(42) 326 IAC 14-8-1 through 14-8-5;
(43) 326 IAC 15-1-1, 15-1-2(a)(1), (a)(2) and (a)(8), 15-1-3 and 15-1-4;
(44) 326 IAC 20-1-1 through 20-1-4 (In 20-1-3(b)(2) the adoption states that “permitting authority” means the commissioner of IDEM or the administrator of OES, whichever is applicable);
(45) 326 IAC 20-2-1;
(46) 326 IAC 20-3-1;
(47) 326 IAC 20-4-1;
(48) 326 IAC 20-5-1;
(49) 326 IAC 20-6-1;
(50) 326 IAC 20-7-1;
(51) 326 IAC 20-8-1;
(52) 326 IAC 20-9-1;
(53) 326 IAC 20-14-1;
(54) 326 IAC 20-15-1;
(55) 326 IAC 20-16-1;
(56) 326 IAC 20-17-1;
(57) 326 IAC 20-18-1;
(58) 326 IAC 20-19-1;
(59) 326 IAC 20-20-1;
(60) 326 IAC 20-21-1;
(61) 326 IAC 21-1-1 (The adoption states that “or the administrator of OES” is added in (b));
(62) 326 IAC 22-1-1 (The adoption states that “or the administrator of OES” is added in (b)).

Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services

Addendum to the
Technical Support Document for Part 70 Operating Permit

Source Name: **Cargill Dry Corn Ingredients, Inc.**
Source Location: **1730 West Michigan Street, Indianapolis, Indiana 46222**
County: **Marion**
SIC Code: **2041**
Operation Permit No.: **T097-5458-00020**
Permit Reviewer: **M. Caraher**

On December 20, 2002, the Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) had a notice published in the Indianapolis Star newspaper, Indianapolis, Indiana, stating that Cargill Dry Corn Ingredients, Inc. (Cargill-DCI) had applied for a Part 70 Operating Permit to operate a grain storage, handling and milling operation under a Standard Industrial Classification (SIC) Code of 2041 (Corn Handling and Processing). The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

In an effort to increase community involvement and public outreach in proposed Part 70 Operating Permits, OES sent public notice notification letters to six (6) organizations or entities who may be interested parties in the proposed Part 70 Operating Permit issuance for Cargill-DCI These organizations were the Westside Cooperative Association, Haughville Community Council, Marion County Alliance of Neighborhood Associations (MCANA), MCANA - Center Township, Indianapolis Public Schools and the Indianapolis Water Company.

On December 20, 2002 and on January 15, 2003, the consulting firm Montgomery Watson (MWH) submitted written comments on Cargill-DCI behalf on the proposed Part 70 permit. No other written comments were received. The summary of the comments is as follows:

Comment 1:

It appears that some of the air flows in the Technical Support Document Appendix A table (page 2 of 4) are not accurate. Specifically:

(a) D-7 airflow should be 8092 cfm
(b) D-30 and D-31 should have a total airflow of 7804 cfm (3902 each)
(c) D-35 should have an airflow of 2470 cfm (same as D-34)
(d) D-50 should have an airflow of 10,000 cfm

Response to Comment 1:

Specific emission unit information for this review was taken from the original application of February 23, 1996 and the revised application of October 8th, 1997. Additional information in regards to a detailed examination of integral controls, resultant potential to emit and air flow rates was received on March 24 and July 10, 2000. In reviewing the proposed Part 70 Permit and Technical Support Document (TSD), the air flow rates stated above are stated correctly in those documents. It is only in the TSD Appendix A page 2 of 4 that the air flow rates are stated incorrectly. The OAQ and OES prefer that the Technical Support Document reflect the permit that was on public notice. The public notice version Technical Support Document and Appendix A calculation pages do not change. Changes to the permit or technical support

material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Therefore, TSD Appendix A page 2 of 4 is revised in this TSD Addendum as stated below to state the correct air flow rates for these units based on the application and support information received by OAQ and OES (deletions are in strikeout and additions are in bold face type).

Unit ID	Stack/Vent ID	CFM	
D-7 (New Mill Dryer)	3	~~8992~~ **8092**	
D-30 (Germ Recovery System)	17	~~3902~~	**3902**
D-31 (Germ Recovery System)	18		**3902**
D-35 (Flour Receiver)	22	~~3530~~ **2470**	
D-50 (Masa Hammermill Dust System)	D-50	~~6700~~ **10,000**	

Comment 2:

The origin of some of the calculated emissions (uncontrolled PTE) in TSD Appendix A page 2 of 4 are not clear. Specifically:

(a) D-50 (MWH calculated this at 78.84 ton/yr, using 0.012 lb/ton (which includes control device) and 99% collection efficiency; OES calculated 87.8 tpy)

(b) D-55 (MWH calculated this at 0.02 tpy, based on a conservative 0.22 lb/ton emission factor, 99% control efficiency for integral baghouse, and 2 ton/hr throughput; unsure of the source of the OES calculated value)

(c) D-54 (MWH calculated this at 0.02 tpy, based on a conservative 0.22 lb/ton emission factor,99% control efficiency for integral baghouse, and 2 ton/hr throughput; unsure of the source of the OES calculated value)

(d) D-4 (MWH calculated this at 7.23 tpy, based on a conservative 0.22 lb/ton emission factor, 99% control efficiency for integral baghouse, and 2 ton/hr throughput; unsure of the source of the OES calculated value)

Response to Comment 2:

Utilizing the AP-42 Table 9.9.1-2 baghouse controlled emission factor for particulate matter from D-50 (Masa Hammermill Dust System), the correct uncontrolled potential to emit is 78.84 tons of particulate matter per year (15 tons/hr x (0.012 lbs PM/ton / (1 - 0.99 control efficiency)) x 8760 hrs/yr x ton/2000 lbs = 78.84 tons PM/yr). OES utilized the AP-42 emission factor but transposed the correct number in the table to 87.8 tons in Appendix A page 2 of 4. This error has no effect on the TSD discussion on pages 23 and 24 of 38 or in the proposed Part 70 Permit in Section D.8. The OAQ and OES prefer that the Technical Support Document reflect the permit that was on public notice. The public notice version Technical Support Document and Appendix A calculation pages do not change. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Therefore, TSD Appendix A page 2 of 4 is revised in this TSD Addendum as stated in the Table below (deletions in strikeout, additions in boldface type) to state 78.84 tons for D-50.

In regards to D-54 and D-55, OES received on May 18, 2000 an Exemption application under the application tracking number 097-12273-00020 to increase the maximum process rate of D-54 and D-55 from 0.5 tons per hour to 2.0 tons per hour. The Exemption request did not increase potential to emit for these insignificant activities possessing integral controls, D-54 and D-55, and, therefore, did not increase PM potential to emit to above significant emission thresholds. The request was combined in to this approval and issuance. These units are included in the proposed Part 70 Permit and the TSD Insignificant Activity list as (i) and (j) and do reflect the correct maximum throughput capacity of 2.0 tons per hour. In utilizing the AP-42

Table 9.9-1-1 uncontrolled emission factor of 0.22 pounds PM per ton of material handled, controlled PM emissions from the use of an integral control device at ninety nine percent (99%) efficiency for D-54 and D-55 each equate to 0.02 tons per year (2.0 tons per hour x (0.22 pounds PM/ton x (1 - 0.99 control efficiency)) x 8760 hrs/yr x ton/2000 lbs = 0.02 tons PM per year) and not 0.0 tons per year for each unit. Based on the AP-42 emission factor of 0.22 pounds PM per ton of material handled, the uncontrolled potential to emit should be 1.93 tons per year (2.0 tons per hour x 0.22 pounds PM/ton x 8760 hrs/yr x ton/2000 lbs = 1.93 tons/yr) for each unit and not 2.82 and 0.94 tons per year, respectively, for each unit. OES transposed the correct numbers in the table in Appendix A page 2 of 4. This error has no effect on the TSD discussion on page 27 of 38 or in the proposed Part 70 Permit in Section D.9. TSD Appendix A page 2 of 4 is revised in this TSD Addendum as stated in the Table below (deletions in strikeout, additions in boldface type) to state 0.02 tons per year for D-54 and D-55 each.

In regards to D-4, the Request for Additional Information (RAI) response of November 22, 2002 confirmed that the correct process rate for D-4 was 7.5 tons per hour, as was listed in the public notice documents, and that this unit was considered to have an integral control device. In utilizing the AP-42 Table 9.9-1-1 uncontrolled emission factor of 0.22 pounds PM per ton material handled, controlled PM emissions from the use of an integral control device at ninety nine percent (99%) efficiency for D-4 results in (7.5 tons/hr x (0.22 lbs/ton x (1-0.99 control efficiency)) x 8760 hrs/yr x ton/2000 pounds = 0.08 tons/yr) 0.08 tons PM per year and not 0.00 tons per year as listed in the TSD Appendix A page 2 of 4. Based on the AP-42 emission factor of 0.22 pounds PM per ton of material handled, the uncontrolled potential to emit PM from D-4 should be 7.23 tons per year and not 3.99 tons PM per year. OES is unsure of the origin of 3.99 tons PM per year. However, this error has no effect on the TSD discussion on page 27 of 38 or in the proposed Part 70 Permit in Section D.9. TSD Appendix A values in tons per year on page 2 of 4 is revised in this TSD Addendum as stated in the Table below (deletions in strikeout, additions in boldface type) to state 0.08 tons per year for D-4.

Unit ID	Stack /Vent ID	Uncontrolled PTE	PTE after Integral Controls
		PM	PM
D-50 (Masa Hammermill Dust System)	D-50	~~87.8~~ **78.84**	~~87.8~~ **78.84**
D-54 (Joshi 3 Dryer Filter Receiver)	D-54	~~2.82~~ **1.93**	~~0.00~~ **0.02**
D-55 (Joshi 3 Finished Product Filter Receiver)	D-55	~~0.94~~ **1.93**	~~0.00~~ **0.02**
D-4 (Masa "B" Cooking)	D-4	~~3.99~~ **7.23**	~~0.00~~ **0.08**

Comment 3:

It is not clear if the emissions presented in the columns entitled "Limits Under 6-1-2 or 6-1-12" in Appendix A of the TSD (page 2) are supposed to match those presented in the table in the TSD under the section "Potential to Emit After Issuance." Some/most of these calculated emissions do not match. Specifically:

(a) D-20: TSD App A table calculates a limit of 14.19 tpy, text PTE after Issuance is 30.7 tpy
(b) D-15A and D-15B: TSD App A table calculates a limit of 9.6 tpy, text PTE after Issuance is 12.5 tpy (combined or each unit?)
(c) D-5: TSD App A table calculates a limit of 13.49 tpy, text PTE after Issuance is 2.4 tpy
(d) D-21to D-26 and D-30, D-31, D-37: TSD App A table calculates a limit of 64.61 total (all 9 units), text PTE after Issuance is 490.8 tpy
(e) Values aren't calculated for D-43 and D-47 in the TSD App A table
(f) D-4, D-27-29, D-32-36, D-38-42, D-54-55: TSD App A table calculates a limit of 65.67 tpy total (all units), text PTE after issuance is 25.2 tpy
(g) D-48-49, D-53: TSD App A table calculates a limit of 10.03 tpy total, text PTE after issuance

is 12.4 tpy

Further details on the sources of the calculations would be helpful to avoid confusion.

Response to Comment 3:

The purpose of the TSD Appendix A page 2 of 4 column entitled “Limits Under 6-1-2 or 6-1-12" was to specifically identify those emission units and their limited potential to emit value(s) in tons per year that are listed in the State Implementation Plan pursuant to 326 IAC 6-1-12 (Nonattainment Area Limitations: Marion County). These emission units are 19 (Cleaver Brooks Boiler #1), D-6 (New Mill Dryer), D-7 (New Mill Dryer), D-8 (New Mill Cooler), D-11and D-14 (Elevator Headhouses) and D-15 (Oil Mill Dust System). The potential to emit values are stated correctly in the TSD Appendix A table column on page 2 of 4 and in the TSD Potential to Emit After Issuance Table on page 11 of 38.

Additionally, the purpose of the TSD Appendix A column entitled “Limits Under 6-1-2 or 6-1-12" was to extrapolate the 326 IAC 6-1-2(a) limit of 0.03 grains per dry standard cubic foot of exhaust air to what the PM emission rate would be in tons per year utilizing the reported exhaust air flow rate for those units not listed in the SIP. The extrapolation is not federally enforceable and was listed for information purposes only. If there was not a previous construction permit limit on potential to emit in tons per year or there was not a limit imposed on emission units such that 326 IAC 2-2 (Prevention of Significant Deterioration) did not apply, the tons per year value listed in TSD Potential to Emit After Issuance Table on page 11 of 38 reflects the uncontrolled potential to emit taken from the emission unit inventory report submitted by Montgomery Watson on behalf of Cargill-DCI on July 10, 2000 entitled “1999 Air Emissions Inventory Report.” In addition, the footnote to the TSD Potential to Emit After Issuance Table on page 11 of 38 states that “All other values represent unrestricted PTE or resultant PTE following and enforceable limitation for a limited pollutant.” In the TSD under *State Rule Applicability - Individual Facilities*, each emission unit has a detailed explanation of enforceable PM emission limitations. An extrapolated value in tons per year for D-43 and D-47 was not listed in “Limits Under 6-1-2 or 6-1-12" because these load out operations do not have an exhaust air flow rate.

As a result, there are no changes to the TSD Potential to Emit After Issuance Table on page 11 of 38, TSD Appendix A page 2 of 4 or to the proposed Part 70 Permit.

Comment 4:

In the TSD there is a section entitled "Enforcement Issue" and a few of the sources are listed in this section. Cargill-DCI is seeking further clarification on this section. According to Cargill-DCI records, construction permitting exemptions were granted for D-4, D-50, and D-52. In the case of D-50 and D-52, these exemptions were based on their control devices being "integral"; however upon closer evaluation in 2000 (at the request of OES), it was determined that these control devices were not integral. For D-47 (a very old source) it may not have required permitting (?). Further discussions on this issue would be appreciated. Also, clarification on what appropriate action might be taken is requested.

Response to Comment 4:

Following OES inspections of September 23 and October 16, 2002, it was determined that emission units installed on or after 1997 conflicted with what was to be installed pursuant to Construction Permit CP-0970020-01 issued by OES on July 21, 1997. In addition, the actual emission units installed appear to differ from the emission unit inventory report submitted by Montgomery Watson on behalf of Cargill-DCI on July 10, 2000 entitled “1999 Air Emissions Inventory Report.” The Construction Permit issued by OES was for Emission Unit ID D-5 (five dryers and one cooler), D-50 (Joshi Tiger Raw Flour Transfer), D-51 (Joshi Tiger Dry Product Mill Lift) and D-52 (Joshi Tiger Dryer). OES sent a Request for Additional Information (RAI) letter on October 23, 2002 in regard to what emission units constituted D-4, D-5, D-48, D-49, D-50, D-51, D-52, D-53, D-54 and D-55. OES and Cargill-DCI had a meeting on November 7, 2002 to discuss the inspection findings and the issues raised in the RAI letter. Cargill-DCI submitted an RAI response to OES on November 22, 2002 in which it stated that D-52 was an emission unit identifier number that was reassigned to the existing 9th Floor Reroute emission point after the original D-52 (Joshi Tiger Dryer) was not installed. It was determined that D-50, D-51 and D-52, as permitted under Construction Permit CP-0970020-01, were

never installed and the emission unit identifiers for D-50 and D-52 were reassigned to existing units that had never been previously permitted and whose exhausts were redirected from exhausting in to the building to exhausting directly to the outside air. D-50 is now identified as the Masa Hammermill Dust System and D-52 is now identified as the 9th Floor Filter Reroute. OES did receive the letters from Cargill-DCI on March 10, 1999 and on June 28, 1999 in which Cargill-DCI was notifying OES of the exhaust redirection of existing units and stating that they were exempt. The RAI response of November 22, 2002 listed D-50 (Masa Hammermill Dust System) and D-52 (9th Floor Filter Reroute) as significant emission units as potential to emit exceeded minimum permitting thresholds.

OES has no permitting record of D-4. This unit was included in Table 2 of the "1999 Air Emissions Inventory Report" and in the RAI response letter as having integral controls with resultant PTE of 0.009 pounds of PM per hour or 0.04 tons per year which is less than minimum permitting thresholds. D-4 is included in the TSD and the proposed Part 70 Permit Insignificant Activities listing and in Section D.9 of the proposed Part 70 Permit.

In regards to D-47 (Finished Products Shipping and Handling Operations), Cargill-DCI filed an application with OES on December 22, 1993 for this unit existing as of 1974. OES never issued a permit for this existing unit as OES had planned to incorporate it in to a Certificate of Operation renewal for the source. The Certificate of Operation renewal was not issued to Cargill-DCI because the source had applied for a Part 70 Permit in 1996 and has been operating under Certificate of Operation 0020-01 through 0020-29, issued on October 8th, 1991 as well as the other approvals listed in the **Existing Approvals** section of the public notice version TSD. Based on AP-42 emission factors for this unit, D-47 is determined to be an insignificant activity (see TSD Appendix A page 2 of 4).

An enforcement referral has been made to OES' Enforcement Section to address D-50 (Masa Hammermill Dust System) and D-52 (9th Floor Filter Reroute) as significant emission units operating without the proper permit.

Comment 5:

Cargill-DCI is requesting further clarification on the level of detail necessary in the required quarterly inspections of the various control devices as specified in Section D of the permit. Most of the baghouse/filter units at the plant are small and to inspect each sock would be quite cumbersome and time consuming. Bag replacement is already conducted at any point that visible emissions or dust buildup around the stack(s) are noted.

Response to Comment 5:

At a minimum, IDEM, OAQ and OES expect that a visual observation of the condition of the baghouse and filter bags be performed once per calendar quarter. A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions should already be included in the preventive maintenance plan required pursuant to 326 IAC 1-6-3 (Malfunctions: Preventive Maintenance Plans) for existing significant units and by 326 IAC 2-7-5(13)(Part 70 Permit Program: Permit Content) and Section B.11 for all significant emission units controlled by baghouses in the proposed Part 70 Permit.

Comment 6:

Examples of the various required plans (ERP, CRP, and PMP) are requested to assist Cargill-DCI in preparing these plans and determining what level of detail is necessary for each. For the Emergency Reduction Plan (ERP), which according to the permit was submitted in 1988, if possible could a copy of this document be provided such that the facility can update it and re-submit?

Response to Comment 6:

A copy of the Emergency Reduction Plan (ERP) that Cargill-DCI submitted and OES received on September 22, 1988 was forwarded to Cargill-DCI on January 31, 2003. Items and measures to be included

in an updated ERP are specifically outlined in 326 IAC 1-5-2 (Episode Alert Levels: Submission of Emergency Reduction Plans).

Section C.15(a) & (b) states what the Compliance Response Plan (CRP) should be comprised of for each compliance monitoring provision in Section D of the proposed Part 70 Permit,

As stated in subsection (a) of Section B.11, a Preventive Maintenance Plan (PMP) is not needed unless specifically required in Section D. The information identified in B.11(a) should, at a minimum, constitute the PMP. Cargill-DCI should already have a PMP for all existing and previously permitted significant emission units per 326 IAC 1-6-3 (Malfunctions: Preventive Maintenance Plans). 326 IAC 2-7-5(13) (Part 70 Permit Program: Permit Content) requires a source operating under a Part 70 Operating Permit to maintain on site a preventive maintenance plan.

OES has notified the inspector for your source of the need for technical assistance on plan preparation. Cargill-DCI should consult with the inspector for your source as to what the expectation is for each plan.

Comment 7:

Section C.19 of the draft permit lists the general reporting requirements. These requirements specify that the plant should submit the deviation and compliance monitoring report on a quarterly basis. The facility is seeking further clarification on the level of detail that should be included in these reports. Further, because these reports will take time and effort to compile and complete, Cargill-DCI is requesting that the frequency of submittal be reduced to semi-annual if possible.

Response to Comment 7:

Reports must be submitted at least every six months under 326 IAC 2-7-5(3)(C)(i). Compliance monitoring is one of the main goals of the Title V permit program. Once compliance monitoring is required, IDEM, OAQ and OES believe that a period of time longer than every quarter will usually not provide sufficient reporting of continuous compliance. IDEM, OAQ and OES do have the authority to require quarterly reports. Quarterly reporting of fuel use is already required in Section D.1.2 to document compliance with 326 IAC 6-1-12. Sections D.1 through D.8 contain compliance monitoring provisions to document compliance with an applicable limit. Cargill-DCI is not limited to reporting additional information but, at a minimum, the level of detail provided should contain the information requested by each form on pages 57 through 63 of the proposed Part 70 Permit.

Comment 8:

Parametric and Visible Emissions monitoring for various sources is required throughout Section D of the permit. These requirements are given as a "once-per-shift" frequency for monitoring. Can you provide clarification on whether or not this means once per eight hours, once per day, etc. Cargill-DCI currently operates both 8 hr and 12 hr shifts at the plant and just needs to know at which frequency the readings/recordings need to be conducted. Further, Cargill-DCI assumes that visible emissions monitoring during the night is not possible, and thus the frequency for this monitoring is perhaps only once per twelve hour shift (daytime) or once per day?

Response to Comment 8:

Parametric monitoring is once per shift when in operation and venting to the atmosphere. Monitoring of the static pressure drop can alert the operator to relative changes (such as dust cake resistance) over a period of time. The operator can use this information to chart trends and determine if the unit is operating within the optimal range as determined by baseline testing of the unit and manufacturer's specifications. Pressure drop is an indicator of a variety of conditions within the baghouse. Any deviations from the normal operational range of the unit, whether gradual or sudden, should alert the operator that the unit needs maintenance. The Compliance Response Plan should include Response steps to anticipate corrective actions when abnormal conditions arise. Both gradual and sudden changes in the pressure drop could

result in damage to the bags or baghouse if not properly addressed. Therefore, OAQ and OES believe that pressure drop readings should be taken at least once per shift.

OES has notified the inspector for your source of the need for technical assistance on the frequency of pressure drop readings for any specific emission unit in question. Cargill-DCI should consult with the inspector for your source as to what the expectation is for the frequency of parametric monitoring given that some emission units in a specific department may be on a twelve hour operating shift while other departments are on an eight hour shift.

The visible emissions notations are used to indicate compliance with 326 IAC 5-1 and 326 IAC 6, without the requirement to have a person on site trained in opacity measurement. This requirement is designed as a trigger that the source perform some corrective action on the facility if visible emissions are abnormal, to ensure continuous compliance with emission limitations. The Compliance Response Plan should include Response steps to anticipate corrective actions when abnormal conditions arise. The visible emissions notations conditions in Sections D.2.4, D.3.4, D.4.4, D.5.3, D.6.3, D.7.3 and D.8.4 each state "...shall be performed once per shift during normal daylight operations when exhausting to the atmosphere." As a result, night time visible emissions notations are not required by the permit.

OES has notified the inspector for your source of the need for technical assistance on the frequency of visible emission notations for any specific emission unit in question. Cargill-DCI should consult with the inspector for your source as to what the expectation is for the frequency of visible emissions notations for a specific emission unit given that some emission units in a specific department may be on a twelve hour operating shift while other departments are on an eight hour operating shift.

Comment 9:

Cargill-DCI is wondering how we might expect to see response from OES in regards to both the comments that we have submitted, any EPA comments, and any public comments? Should a meeting be arranged to further discuss or will OES simply respond to the comments in a letter or email? Please let us know.

Response to Comment 9:

The OAQ and OES prefer that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. The only written comments OES received during the thirty (30) day public notice period were from Montgomery Watson. The written comments that Montgomery Watson submitted during the public notice period on Cargill-DCI's behalf are addressed in this TSD Addendum with any changes specifically outlined in this Addendum. Any subsequent OAQ, OES or EPA review comments that may arise which need to be addressed will be specifically discussed in this Addendum.

Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Cargill Dry Corn Ingredients, Inc.**
Source Location:	**1730 West Michigan Street, Indianapolis, Indiana 46222**
County:	**Marion**
SIC Code:	**2041**
Permit No.:	**T097-5458-00020**
Permit Reviewer:	**M. Caraher**

The City of Indianapolis Office of Environmental Services (OES) and the Indiana Department of Environmental Management Office of Air Quality (OAQ) have reviewed a Part 70 permit application from Cargill Dry Corn Ingredients, Inc. relating to a grain storage, handling and milling operation under a Standard Industrial Classification (SIC) Code of 2041 (Corn Handling and Processing).

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Cleaver Brooks Boiler #1 identified as Emission Unit ID 19, installed in 1972, has a rated heat input capacity of 33.5 million Btu per hour. The boiler combusts primarily natural gas and has No. 2 fuel oil as a backup capability. Emission Unit ID 19 exhausts at Stack/Vent 1.

(b) Grain receiving operations, identified as D-20. Installed in 1974. The grain receiving operation has a maximum throughput capacity of 200 tons of grain per hour, and is controlled by a baghouse, exhausting at one (1) stack, identified as Stack/Vent 8.

(c) Two (2) grain elevator headhouses, identified as D-11 and D-14. Installed in 1974. Each headhouse has a maximum throughput capacity of 200 tons of grain per hour, and each has cyclone control. Each exhausts at one (1) stack, identified as Stack/Vent 5 and 6, respectively.

(d) New mill drying and cooling operations, identified as D-6 (New Mill Dryer), D-7 (New Mill Dryer), D-8 (New Mill Cooler) and D-15 (Oil Mill Dust System). Installed in 1974. D-6 and D-7 each have a maximum throughput capacity of 25 tons per hour. D-8 has a maximum throughput capacity of 50 tons per hour. D-15 has a maximum throughput capacity of 1.5 tons per hour. Each of these processes is controlled by two cyclones in series. Each operation D-6, D-7, D-8 and D-15 exhaust out one (1) stack identified as Stack/Vent identification 2, 3, 4 and 7, respectively.

(e) Masa corn products drying operations, identified as D-15A (Masa “A” System) and D-15B (Masa “B” System). Installed in 1992. D-15A and D-15B each have a maximum throughput capacity of 6.5 tons per hour. Each of these processes is controlled by two cyclones in series. Each operation exhausts out one (1) stack identified as Stack/Vent 7A and 7B, respectively.

(f) Flaking Grit Drying identified as D-5 and consisting of two dryers. Installed in 1998. The flaking grit drying has a maximum throughput capacity of 2.5 tons per hour and is equipped with a cyclone exhausting at a single Stack identified as Stack/Vent 2.

(g) Two (2) grading systems: Grading system A, with pneumatic conveyance system exhausts identified as D-21, D-22, and D-23, and Grading system B, with pneumatic conveyance system exhausts identified as D-24, D-25, and D-26. Installed in 1974. Grading systems A and B each have a combined maximum throughput capacity of 30 tons of grain per hour. Each pneumatic conveyance system exhaust is equipped with one (1) stack, identified, as Stack/Vent 9, 10, and 11, respectively for grading system A, and Stack/Vent 12, 13, and 14, respectively for grading System B. Each exhaust has baghouse control.

(h) Germ Recovery System, identified as D-30 and D-31. Installed in 1974. Each recovery system has a maximum throughput capacity of 2.5 tons per hour and equipped with common baghouse control exhausting through two (2) stacks identified as Stack/Vent 17 and 18.

(i) One (1) Finished Products System, identified as D-37. Installed in 1974. The finished products system has a maximum throughput capacity of 33 tons of corn products per hour, and is equipped with baghouse control, exhausting through a single stack, identified as Stack/Vent 24.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

(a) Masa Hammermill Dust System identified as D-50. Installed in 1999. The Masa Hammermill Dust System consists of two (2) hammermills with a combined maximum throughput capacity of 15.0 tons per hour and is equipped with a baghouse exhausting at Stack/Vent D-50.

(b) 9th Floor Filter Reroute, identified as D-52. Installed in 1999. This process has a maximum throughput capacity of 4.5 tons per hour and is controlled by a baghouse exhausting at Stack/Vent D-52.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Masa “B” Cooling, identified as D-4 with a maximum throughput capacity of 7.5 tons per hour and exhausts through a baghouse integral to the process and to Stack/Vent D-4. Installed in 1998. [326 IAC 6-1-2(a)]

(b) One (1) Feed Hammermill Lift system, identified as D-27. Installed in 1974. The feed hammermill has a maximum throughput capacity of 28 tons of corn products per hour, and exhausts through three (3) baghouses to a single stack, identified as Stack/Vent 27. These baghouses are considered integral to the process. [326 IAC 6-1-2(a)]

(c) Reduction System A, identified as D-28 and Reduction System B, identified as D-29. Installed in 1974. Each system is rated at a maximum throughput capacity of 12.5 tons per hour and exhausts through a baghouse considered integral to the process and to, respectively, Stack/Vent 15 and Stack/Vent 16. [326 IAC 6-1-2(a)]

(d) Coarse Grit Receiver, identified as D-32 and Brewers Grit Receiver, identified as D-33. Installed in 1974. Each is rated at a maximum throughput capacity of 6.25 tons per hour and exhausts through a baghouse integral to the process and to, respectively, Stack/Vent 19 and Stack/Vent 20. [326 IAC 6-1-2(a)]

(e) Two (2) Flour Receivers, identified as D-34 and D-35, one (1) Granulated Meal Receiver, identified as D-36 and one (1) Soft Meal Receiver, identified as D-38. Installed in 1974. Each is rated at a maximum throughput capacity of 5.0 tons per hour and exhausts through a baghouse integral to the process and to, respectively, Stack/Vent 21, 22, 23 and 25. [326

IAC 6-1-2(a)]

(f) Reduction systems A and B blowers, identified as D-39. Installed in 1974. The reduction systems A and B have a maximum throughput capacity of 12 tons of corn products per hour, and are equipped with baghouse control, exhausting through a single stack, identified as Stack/Vent 26. This baghouse is considered integral to the process. [326 IAC 6-1-2(a)]

(g) Germ Recovery System Blower, identified as D-40 and rated at a maximum throughput capacity of 6.0 tons per hour and exhausting through a baghouse integral to the process and to Stack/Vent 45. Installed in 1974. [326 IAC 6-1-2(a)]

(h) Two (2) Germ Recovery System Feed Blowers, identified as D-41 and D-42 each with a maximum throughput capacity of 8.0 tons per hour and each system exhausts through four (4) baghouses in parallel and integral to the process and exhausting, respectively, through Stack/Vent 28 and 29. Installed in 1974. [326 IAC 6-1-2(a)]

(i) Joshi Dryer, identified as D-54 with a maximum throughput capacity of 2.0 tons per hour and exhausting through one (1) baghouse integral to the process and to Stack/Vent D-54. Installed in 1997. [326 IAC 6-1-2(a)]

(j) Joshi Dry Product Transfer Exhaust, identified as D-55. Installed in 1997. This process is controlled by a baghouse and has a maximum throughput capacity of 2.0 tons per hour. This baghouse is considered integral to the process and exhausts to Stack/Vent D-55. [326 IAC 6-1-2(a)]

(k) Railcar Load out of finished products, identified as D-43, D-44, 44a, 45, 46, and 46A. Installed in 1974. Flour load out and yellow goods loadout are controlled by spout extensions and loadout enclosures only. The D-43 operations have maximum throughput capacity of 25 tons per hour and D-44, 44a, 45, 46 and 46a operations have a combined maximum throughput capacity of 26 tons per hour. [326 IAC 6-1-2(a)]

(l) Finished Products Shipping and Handling Operations, including feed loadout, identified as D-47. Installed in 1974. Feed loadout is controlled by a spout extension only. The operations have maximum throughput capacity of 60 tons per hour. [326 IAC 6-1-2(a)]

(m) Corn Aspiration identified as Emission Unit ID D-48 and controlled by a baghouse exhausting less than 4000 acfm at Stack/Vent D-48. Installed in 1995. [326 IAC 6-1-2(a)]

(n) Masa Cooker Steam Ventilation Unit identified as Emission Unit ID D-49 and controlled by a cyclone exhausting at Stack/Vent D-49. Installed in 1996. [326 IAC 6-1-2(a)]

(o) Raw Bran Bin Dust Filter identified as Emission Unit ID D-53 and controlled by a baghouse exhausting at Stack/Vent D-53. Installed in 1997. [326 IAC 6-1-2(a)]

(p) Natural gas-fired heaters, each rated at less than 10 million Btu per hour; [326 IAC 6-1-2(a)]

(q) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour; [326 IAC 6-1-2(a)]

(r) Brazing equipment, cutting torches, soldering equipment, and welding equipment, not resulting in the emission of HAPs; [326 IAC 6-1-2(a)]

(s) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. [326 IAC 6-1-2(a)]

(t) Cleaners and solvents having a vapor pressure equal to or less than 2 kiloPascals measured

at 38 degrees Celsius (100 degrees Fahrenheit) or having a vapor pressure equal to or less than 0.7 kiloPascals measured at 20 degrees Celsius, the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months; [326 IAC 8-3-5(a) & (b)]

(u) Methylene Bromide fumigant usage for pest control throughout the facility identified as Emission Unit ID F-1.

(v) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4][326 IAC 6-5]

(w) Asbestos abatement projects regulated by 326 IAC 14-10;

(x) Combustion source flame safety purging for startup;

(y) A petroleum fuel dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;

(z) Storage tanks for VOCs and HAPs with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;

(aa) Vessels storing lubricating oils, hydraulic oils, and machining fluids;

(bb) Equipment used exclusively for packaging lubricants and greases;

(cc) Equipment used exclusively for filling drums, pails, or other packaging containers with lubricating oils, waxes, and greases;

(dd) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;

(ee) Machining where an aqueous cutting coolant continuously floods the machining interface;

(ff) Closed loop heating and cooling systems;

(gg) Rolling oil recovery systems;

(hh) On-site sewage treatment facilities;

(ii) Use of water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs;

(jj) Replacement or repair of bags in baghouses and filters in other air filtration equipment;

(kk) Heat exchanger cleaning and repair;

(ll) Process vessel degassing and cleaning;

(mm) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal;

(nn) Purging of gas lines and vessels related to routine maintenance and repair of buildings, structures, or vehicles, where air emissions from those activities would not be associated with any production process;

(oo) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup;

(pp) Sight glass, boiler, compressor, pump, and cooling tower blowdown;

(qq) Furnaces used for melting metals other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume;

(rr) On-site fire and emergency response training approved by the department;

(ss) Purge double block and bleed valves;

(tt) Filter or coalescer media changeout;

(uu) Mold release agents using low volatile products;

(vv) Laboratory facilities;

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Certificate of Operation 0020-01 through 0020-29, issued on October 8th, 1991.

(b) Installation Permit 920020-01 issued November 13, 1992 for Emission Units D-15A and D-15B.

(c) Construction Permit 940020-01 issued for Emission Unit D-19A on January 13, 1995.

(d) Construction Permit 950020-01 issued for Emission Unit D-19A on March 13, 1995 to amend the previously issued Construction Permit 940020-01 issued for D-19A.

(e) Exemption letter of June 26, 1995 for Emission Unit D-48.

(f) Exemption letter of February 1, 1996 for Emission Unit ID D-49.

(g) Exemption letter of May 28, 1997 for Emission Unit ID D-53, D-54 and D-55.

(h) Construction Permit 970020-01 issued July 21, 1997 for Emission Unit ID D-5, D-50, D-51 and D-52.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(a) Construction Permit 940020-01 and Construction Permit 9500201-01 issued, respectively, January 13, 1995 and March 13, 1995. All Conditions.

Reason not incorporated: None of the conditions are incorporated as Cargill notified OES on May 17, 2001 that Emission Unit ID 19A was removed from the site and relocated to a facility in Paris, Illinois. Therefore, Emission Unit ID 19A is not incorporated in to the proposed Title V Permit.

(b) Exemption letter of May 28, 1997 for Emission Unit ID D-53, D-54 and D-55 Condition entitled "Particulate Matter Limitations".

Reason not incorporated: The condition stated limited particulate matter emissions for each emission unit to 2.58 pounds per hour pursuant to 326 IAC 6-3-2 (Process Operations: Particulate Matter Emissions). Pursuant to 326 IAC 6-1-2(a), sources or facilities having the potential to emit one hundred (100) tons or more of particulate matter and not otherwise regulated by 326 IAC 6-1-2(b) through (g), shall be limited to 0.03 grains per dry standard cubic foot of exhaust. 326 IAC 6-1-2(a) applies to this source because potential to emit exceeds one hundred (100) tons per year. In addition, 326 IAC 6-3-1(c) specifically states that 326 IAC 6-3-2 shall not apply to a source if it is otherwise limited by 326 IAC 6-1. Therefore, 326 IAC 6-3-2 does not apply to this source and the allowable particulate matter emissions for each emission unit of 2.58 pounds per hour pursuant to 326 IAC 6-3-2 (Process Operations: Particulate Matter Emissions) is not incorporated in to the proposed Title V Permit.

(c) Construction Permit 970020-01 issued July 21, 1997 for Emission Unit ID D-5, D-50, D-51 and D-52. All conditions with respect to Emission Unit ID D-50, D-51 and D-52.

Reason not incorporated: No Affidavit of Construction for Emission Unit ID D-50 (Joshi Tiger Raw Flour Transfer), D-51 (Joshi Tiger Dry Product Mill Lift System) or D-52 (Joshi Tiger Dryer) was filed with OES and/or OAQ. In addition, Cargill notified OES in writing on May 17, 2001 that it was uncertain of the origin of D-51 and that records on this facility and identifier were not available.

Following OES' inspection of September 23 and October 16, 2002, it was determined that the naming and equipment descriptions for D-5, D-50 and D-52 needed to be reexamined. A Request for Additional Information (RAI) letter was sent to Cargill by OES on October 23, 2002. A source meeting to discuss the RAI was held on November 7, 2002. Based on the source inspection, RAI response and source meeting findings, it was determined that neither Emission Unit ID D-50 (Joshi Tiger Raw Flour Transfer), D-51 (Joshi Tiger Dry Product Mill Lift System) nor D-52 (Joshi Tiger Dryer) were ever constructed. In addition, it was determined that two (2) existing emission units that previously had been vented indoors and that had never been previously permitted were now being identified as Emission Unit ID D-50 (Masa Hammermill Dust System) and D-52 (9th Floor Filter Reroute). Cargill submitted written letters on March 10, 1999 and on June 28, 1999 seeking an exemption status for redirecting the vents to exhaust to the outside air. However, these units have the potential to emit PM in excess of 5.0 tons per year and are, therefore, not insignificant activities (see TSD Appendix A page 2 of 4).

The identification and naming of these units was consistent with information supplied in the report entitled '1999 Air Emissions Inventory Report for Illinois Cereal Mills, Indianapolis, Indiana' which was submitted as Title V application support information for resultant PTE using "integral controls". These units were identified as not having "integral controls."

Therefore, Emission Unit ID D-50, D-51 and D-52, as permitted under Construction Permit 970020-01 issued July 21, 1997, are not being incorporated in to the proposed Title V permit.

(d) Construction Permit 970020-01 issued July 21, 1997 for Emission Unit ID D-5, D-50, D-51 and D-52. Operation Condition Number 10 Particulate Matter Limitation with respect to Emission Unit ID D-5.

Reason not incorporated: Emission Unit ID D-50, D-51 and D-52 were not constructed. These units, when combined with Emission Unit ID D-5, had the potential to emit PM enforceably limited by Operation Condition Number 10 to 23.55 tons per year such that 326 IAC 2-3 (Emissions Offset) did not apply. The Construction Permit 970020-01 issued July 21, 1997, did not enforceably limit or address PM10 emissions as PM10 emissions were deemed to be twenty five percent (25%) of PM emissions.

The potential to emit PM and PM10 from Emission Unit ID D-5 was based on the AP-42 interim emission factor of 0.825 pounds of PM per ton of product dried (0.33 x a dustiness ratio of 2.5). The current AP-42 Table 9.9.1-1 PM emission factor for grain products drying is 0.22 pounds of PM per ton of product dried. This emission factor, at a maximum process rate of 2.5 tons per hour, yields 0.55 pounds of PM per hour and 2.4 tons per year (see TSD Appendix A page 2 of 4). Pursuant to AP-42 Table 9.9.1-1, PM10 emissions are twenty five percent (25%) of PM emissions. As a result, the potential to emit PM and PM10 do not exceed the major modification threshold under 326 IAC 2-2 (Prevention of Significant Deterioration).

Since three of the units were not constructed and the remaining unit that was constructed does not yield potential to emit in excess of the major modification threshold of fifteen (15) tons per year of PM10 and/or twenty five (25) tons per year of PM, the PM emission cap of twenty three and fifty five hundredths (23.55) tons per year is no longer necessary and will not be incorporated in to the proposed Title V Permit. However, Emission Unit ID D-5 must meet the Operation Condition Number 10 limit of 0.015 grains per dry standard cubic foot of exhaust air. At an exhaust air flow rate of 12000 cfm, this is equivalent to 1.54 pounds per

hour.

The cyclones for particulate matter control shall be in operation at all times D-5 is in operation in order to comply with the PM limit. Therefore, these conditions limit the PTE of PM to less than the applicable emission limit pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Limitations) and demonstrate compliance with 326 IAC 2-2 (Prevention of Significant Deterioration) and Operation Condition Number 10 of Construction Permit 970020-01 issued July 21, 1997.

(e) Installation Permit 920020-01 issued November 13, 1992 for Emission Units D-15A and D-15B. Operation Condition Number 3 with respect to allowable PM emissions in tons per year.

Reason not incorporated: PM emissions from each emission unit were limited to 9.6 tons per year. The AP-42 Table 9.9.1-1 uncontrolled emission factor of 0.22 pounds PM per ton of corn product dried at a process rate of 6.5 tons per hour yields a potential emission rate (6.5 tons/hr x 0.22 pounds/ton x 8760/2000 = 6.26 tons of PM/yr) less than the restricted allowable rate of 9.6 tons per year. Imposing an annual throughput limit in order to demonstrate compliance with the ton per year limit set in Condition 3 of Installation Permit 920020-01 would result in a limited throughput rate that is higher than maximum capacity.

However, Emission Unit ID D-15A and 15B must meet the Operation Condition Number 3 limit of 0.02 grains per dry standard cubic foot of exhaust air. At an exhaust air flow rate of 10000 dscfm for each unit, this is equivalent to 1.71 pounds per hour.

The cyclones for particulate matter control shall be in operation at all times D-15A and D-15B are in operation in order to comply with the PM limit. Therefore, these conditions limit the PTE of PM to less than the applicable emission limit pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Limitations) and demonstrate compliance with 326 IAC 2-2 (Prevention of Significant Deterioration) and Operation Condition Number 3 of Installation Permit 920020-01 issued November 13, 1992.

Therefore, Emission Unit ID D-15A and D-15B allowable PM ton per year emission rate of 9.6 tons per year for each unit is not being incorporated in to the proposed Title V permit.

(f) Certificate of Operation 0020-01 through 0020-29, issued on October 8th, 1991. Allowable TSP pound per hour emission rates for D-20, D-21, D-22, D-23, D-24, D-25, D-26, D-27, D-28, D-29, D-30, D-31, D-32, D-33, D-34, D-35, D-36, D-37, D-38, D-39, D-40, D-41 and D-42.

Reason not incorporated: Pursuant to 326 IAC 6-1-2(a), each emission unit has an applicable short term emission rate of 0.03 grains/dscf. The hourly allowable emission rates were calculated using the rated exhaust air flow rate in acfm for each of these units and were not the result of New Source Review permitting or a Construction Permit. All of these units were constructed prior to August 7, 1977 and, therefore, predate 326 IAC 2-2 applicability. None of these units are specifically identified in 326 IAC 6-1-12 (Nonattainment Area Limitations: Marion County). There have been no modifications to these units that would have then been subject to 326 IAC 2-2. In addition, D-27, D-28, D-29, D-32, D-33, D-34, D-35, D-36, D-38, D-39, D-40, D-41 and D-42 are deemed to have integral controls. The resultant potential to emit qualifies as an Insignificant Activity (see TSD Appendix A page 2 of 4). Therefore, an equivalent mass emission rate for these units is not necessary.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the following systems an/or control devices be considered as an integral part of the processes:

(a) Masa B Cooling System, identified as D-4

(b) One (1) Feed Hammermill Lift system, identified as D-27

(c) Reduction System A, identified as D-28

(d) Reduction System B, identified as D-29

(e) Germ Recovery System Cyclones, prior to baghouse control/exhaust, identified as D-31

(f) Course Grit Receiver, identified as D-32

(g) Brewer's Grit Receiver, identified as D-33

(h) Flour Receiver, identified as D-34

(i) Flour Receiver, identified as D-35

(j) Gran. Meal Receiver, identified as D-36

(k) Soft Meal Receiver, identified as D-38

(l) Reduction Systems A & B, identified as D-39

(m) Germ Recovery System, identified as D-40

(n) Feed Blowers, identified as D-41

(o) Feed Blowers, identified as D-42

(p) Joshi Dryer System, identified as D-54

(q) Joshi Product Transfer Exhaust Blower, identified as D-55

On March 25, 1999, OES sent a request letter to Cargill to document and provide justification for which emission units Cargill deemed to have integral controls. On March 24, 2000, Montgomery Watson, on behalf of Cargill Dry Corn Ingredients, submitted a listing and a justification of which emission units should be considered to have "integral control" devices. On July 10, 2000, Montgomery Watson submitted the report entitled "1999 Air Emissions Inventory Report for Illinois Cereal Mills, Indianapolis, Indiana" as a detailed examination of which units at the source should be considered to have "integral controls" and a detailed reexamination of the resultant source wide potential to emit regulated pollutants.

The report(s) provided documentation that the above listing of process' control devices are inherent to the physical and operational design of the facility on the grounds that these facilities cannot operate without the pollution control equipment. Cargill stated that the control devices were "inherent to the physical and operational design of the facility on the grounds that the processes would not be viable without the operation of control equipment because the add on controls served the primary purpose of the direct conveyance or transfer of various facility products from one system to the next."

IDEM, OAQ and OES have evaluated the justifications and agreed that the above mentioned equipment will be considered as integral parts of the processes. Therefore, the permitting level will be determined for these facilities using the potential to emit after the air pollution control equipment.

Enforcement Issue

(a) IDEM, OAQ and OES are aware that equipment has been constructed and prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled ***Unpermitted Emission Units and Pollution Control Equipment***.

Masa "B" Cooling, identified as D-4 and Finished Products Shipping and Handling Operations, including feed loadout, identified as D-47, which were never previously permitted, are calculated to have emissions categorized as an insignificant activity (see TSD Appendix A page 2 of 4).

(b) IDEM, OAQ and OES are reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A FESOP application was received from this source on February 23, 1996. At the time of application submittal, Cargill Dry Corn Ingredients, formerly Illinois Cereal Mills, submitted a cover letter requesting that process rates and flow rates that had been marked "Confidential" in the application continue to be held confidential as was historically done by OES for past permitting of this source at Cargill's request based on the grounds that this information should be considered "trade secrets." Cargill provided copies of a public viewing application and a complete "Confidential" application. Because IC 13-14-11-1 consists of a statutory mandate that "emission data" must be considered public records regardless of the trade secret status of the information, IDEM, OAQ and OES are under a statutory duty to release the requested information to the public. Therefore, Cargill's confidentiality request was denied in a written letter to the source on October 28, 2002.

Cargill submitted an administratively complete Part 70 permit application for the purposes of this review on October 8th, 1997.

On August 6, 1998, Cargill supplemented the initial application with forms for the existing Emission Unit ID D-4, Masa "B" Cooling, stating that this unit had "integral controls" and detailing potential emissions calculations to document that the unit did not have significant emissions of regulated pollutants.

Additional information in regards to a detailed examination of integral controls and potential to emit was received on March 24 and July 10, 2000.

An Exemption application under the application tracking number 097-12273-00020 was received on May 18, 2000 to increase the maximum process rate of D-53, D-54 and D-55 from 0.5 tons per hour to 2.0 tons per hour. The Exemption request does not appear to increase potential to emit for these operations possessing integral controls, D-54 and D-55, and does not increase PM or PM10 potential to emit to above significant emission thresholds. This request will be combined in to this approval and issuance.

On May 20, 2002, an operating name change request was received under the application tracking number 097-15644-00020. The name change request to change from Illinois Cereal Mills to Cargill Dry Corn Ingredients, Incorporated will be combined in to this approval and issuance.

A fugitive dust plan was submitted to OES on June 18, 2002.

Following OES' inspection of September 23 and October 16, 2002, it was determined that the naming and equipment descriptions for D-4, D-5, D-50, D-52, D-53, D-54 and D-55 needed to be reexamined. A RAI letter was sent to Cargill by OES on October 23, 2002. A source meeting to discuss the RAI and applicability of 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) was held on November 7, 2002. A written response to the RAI was received by OES on November 22, 2002, stating that Emission Unit ID D-50 (Joshi Tiger Raw Flour Transfer), D-51 (Joshi Tiger Dry Product Mill Lift System) nor D-52 (Joshi Tiger Dryer) from Construction Permit 970020-01 issued July 21, 1997 were not constructed. Installation dates, maximum process rates and potential emissions for Emission Unit ID D-4, D-5, D-48, D-49, D-50 (Masa Hammermill Dust), D-52 (9th Floor Filter Reroute),

D-53, D-54 and D-55 were confirmed.

Emission Calculations

See Appendix A (Pages 1 through 4 of 4) of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	> 250
PM-10	> 250
SO_2	< 100
VOC	< 10
CO	< 25
NO_x	< 25

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Methylene Bromide	7.9
TOTAL	***7.9***

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions
Since this source has an applicable New Source Performance Standard category that was in effect on August 7, 1980, the fugitive particulate matter emissions are counted toward determination of Prevention of Significant Deterioration (PSD) and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 (2001 emissions) OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	45.32
PM-10	44.80
SO_2	0.04
VOC	0.94
CO	8.82
NO_x	5.88
HAP (Methylene Bromide)	7.90

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission

units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Emission Unit ID 19 (Cleaver Brooks Boiler # 1)	0.014 pounds per million Btu & 1.0 tons (a)	1.0	0.5 pounds per million Btu (b); 35.5	0.7	11.0	13.2	Negligible
Emission Unit ID D-20 (Grain Receiving)	30.7	6.8	---	---	---	---	---
Emission Unit ID D-6 (New Mill Dryer)	0.03 gr/dscf & 12.0 tons (a)	6.0	---	---	---	---	---
Emission Unit ID D-7 (New Mill Dryer)	0.03 gr/dscf & 9.4 tons (a)	6.0	---	---	---	---	---
Emission Unit ID D-8 (New Mill Cooler)	0.03 gr/dscf & 3.1 tons (a)	12.0	---	---	---	---	---
Emission Unit ID D-15 (Oil Mill Dust System)	0.03 gr/dscf & 5.9 tons (a)	3.0	---	---	---	---	---
Emission Unit ID D-15A & D-15B (Masa “A” & Masa “B” System)	each 0.02 gr/dscf & 2.2 pounds per hour (c); 12.5	3.1	—	—	—	—	---
Emission Unit ID D-11 (Elevator Headhouse)	0.03 gr/dscf; 3.1 tons (a)	29.8	—	—	—	—	---
Emission Unit ID D-14 (Elevator Headhouse)	0.03 gr/dscf; 6.0 tons (a)	29.8	—	—	—	—	---

Emission Unit ID D-5 (Flaking Grit Drying)	0.015 gr/dscf (d); 0.55 pounds per hour; 2.4 tons per year	0.6	—	—	—	—	---
Emission Unit ID D-21, D-22, D-23, D-24, D-25, D-26, D-30, D-31, D-37	490.8	482.9	—	—	—	—	---
Emission Unit ID D-50 (Masa Hammermill Dust)	0.03 gr/dscf, 2.6 lbs/hr & < 25 tons per year (e)	0.03 gr/dscf, 0.6 lbs/hr & < 15 tons per year (e)	—	—	—	—	—
Emission Unit ID D-52 (9th Floor Filter Reroute)	0.015 gr/dscf, 4.6 lbs/hr & < 25 tons per year (e)	0.015 gr/dscf, 1.2 lbs/hr & < 15 tons per year (e)	—	—	—	—	—
Insignificant Activity - Emission Unit ID D-43, D-44, D-44a, D-45, D-46, D-46a & D-47 (Railcar Load out of finished products & Feed)	1.6	1.6	—	—	—	—	—
Insignificant Activity - Emission Unit ID D-4, D-27, D-28, D-29, D-32, D-33, D-34, D-35, D-36, D-38, D-39, D-40, D-41, D-42, D-54, D-55 (Emission Units with “integral controls”)	25.2	25.2	—	—	—	—	—
Insignificant Activity - D-48, D-49, D-53	12.4	10.6	—	—	—	—	—
Insignificant Activity - Methylene Bromide fumigant usage for pest control	—	—	—	—	—	—	7.9 / 7.9
Total Emissions	666.1	648.4	35.5	0.7	11.0	13.2	7.9 / 7.9

(a) Pursuant to 326 IAC 6-1-12
(b) Pursuant to 326 IAC 7-1.1-2(a)(3)
(c) Pursuant to Installation Permit 920020-01 issued November 13, 1992
(d) Pursuant to Construction Permit 970020-01 issued July 21, 1997
(e) Pursuant to this permit such that 326 IAC 2-2 does not apply
All other values represent unrestricted PTE or resultant PTE following an enforceable limitation for a limited pollutant

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO_2	maintenance attainment
NO_2	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Marion County has been classified as attainment or unclassifiable for PM-10, SO_2, NO_x and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this source has a New Source Performance Standard category that was in effect on August 7, 1980 (40 CFR 60.300 Subpart DD Standards of Performance for Grain Elevators), the fugitive particulate matter emissions are counted toward determination of Prevention of Significant Deterioration (PSD) and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) The Cleaver Brooks Boiler #1 identified as Emission Unit ID 19 is not subject to the requirements of the New Source Performance Standard, 326 IAC 12 and 40 CFR 60.40b, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) because the Emission Unit was installed prior to the applicability date of June 19, 1984, and does not have heat input capacity greater than 100 million Btu per hour.

The Cleaver Brooks Boiler #1 identified as Emission Unit ID 19 is not subject to the requirements of the New Source Performance Standard, 326 IAC 12 and 40 CFR 60.40c, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) because it was installed prior to the applicability date of June 9, 1989.

The Cleaver Brooks Boiler #2 identified as Emission Unit 19A, installed in 1995 under Construction Permit 940020-01 and Construction Permit 9500201-01 and included in the initial Title V permit application, is no longer subject to the New Source Performance Standard, 326 IAC 12 and 40 CFR 60.40c, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) because Cargill notified OES on May 17, 2001 that Emission Unit D-19A was removed from the site and relocated to a facility in Paris, Illinois. The removal of the unit from the site has been verified by OES inspection.

This grain storage elevator and milling source has a permanent grain storage capacity in excess of 1 million bushels. However, grain receiving, storage, load out and handling operations at Cargill Dry Corn Ingredients are not subject to the New Source Performance Standard, 326 IAC 12 and 40 CFR 60.300, Subpart DD (Standards of Performance for Grain Elevators), because this facility commenced operations in, approximately, 1974, prior to the applicability date of August 3, 1978 for Subpart DD. There have been no modifications after 1978 to grain receiving, storage, load out or handling operations which resulted in an increase in the emission rate for the pollutant (PM) to which the standard applies.

Emission Units D-15A and D-15B, Emission Unit D-48, Emission Unit ID D-49, Emission Unit ID D-53, D-54 and D-55 and Emission Unit ID D-5, D-50 and D-52, are not subject to the New Source Performance Standard, 326 IAC 12 and 40 CFR 60.300, Subpart DD (Standards of Performance for Grain Elevators) because, pursuant to 40 CFR 60.304(4), none of these operations involved the construction, modification or reconstruction of permanent grain storage capacity and/or hourly grain handling capacity. In addition, these processes involve the production of grain products and byproducts and do not involve additional grain storage, handling or loadout capacity.

(b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 20, (40 CFR 63.460, Subpart T National Emission Standards for Halogenated Solvent Cleaning) because the source does not utilize any solvent specifically identified in 40 CFR 63.460(a) in a total concentration greater than five percent (5.0%) by weight as a cleaning or drying agent in an individual batch vapor, in-line vapor, in-line cold or batch cold solvent cleaning machine. Wipe cleaning activities, such as using a rag containing halogenated solvent or a spray cleaner using halogenated solvent are not covered under the provisions of this Subpart.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

(c) Neither the source or any emission unit at the source is subject to the requirements of 40 CFR Part 64 Compliance Assurance Monitoring because no Pollutant Specific Emissions Unit (PSEU) at the source has actual emissions after control in excess of a major source threshold and utilizes a control device to comply with an applicable requirement.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on September 22, 1988. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

This source is not of the listed 28 source categories as defined in 326 IAC 2-2-1(y)(1). This source has the potential to emit greater than two hundred and fifty (250) tons per year of PM and PM-10 and is, therefore, a major source pursuant to 326 IAC 2-2. This source was existing prior to August 7, 1977 and was an existing major source pursuant to 326 IAC 2-2 as of August 7, 1977.

This source has had two (2) modifications (see TSD discussion for ***State Rule Applicability - Individual Facilities*** for Emission Unit ID D-15A and D-15B and Emission Unit ID D-5, D-50 and D-52) for which potential to emit was enforceably restricted such that they were not major modifications under 326 IAC 2-2.

Since this source has a New Source Performance Standard category that was in effect on August 7, 1980 (40 CFR 60.300 Subpart DD Standards of Performance for Grain Elevators), the fugitive particulate matter emissions are counted toward determination of Prevention of Significant Deterioration (PSD) and/or Emission Offset applicability.

326 IAC 2-3 (Emission Offset)

Marion County is attainment, maintenance attainment or unclassifiable for all criteria air pollutants. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply.

326 IAC 2-4.1 (New Source Toxics Control)

This existing source commenced operation prior to July 27, 1997 and does not have the potential to emit hazardous air pollutant (HAP) emissions of greater than ten (10) tons per year for any individual HAP nor does this source have the potential to emit HAP of greater than twenty five (25) tons per year for any combination of HAP. This source did not undergo a construction or a reconstruction of a major HAP source after July 27, 1997. Therefore, this source is not subject to 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year in Marion County of NO_x and/or more than one hundred (100) tons per year of PM-10. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 2-7 (Part 70 Permit Program)

This source has the potential to emit greater than one hundred (100) tons per year of PM-10 and is, therefore, a major source pursuant to 326 IAC 2-7 and has opted to seek a permit under 326 IAC 2-7.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) for any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1-2(a) (Nonattainment Area Limitations)

Sources or facilities located in Marion County which have the potential to emit greater than one hundred (100) tons per year of particulate matter or that have actual emissions greater than ten (10) tons per year and are not otherwise limited by 326 IAC 6-1-2(d) or 326 IAC 6-1-12 shall not exceed three hundredth (0.03) grains per dry standard cubic foot of exhaust air.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Pursuant to 326 IAC 6-5-3, any source of fugitive particulate matter which has potential fugitive particulate matter emissions of twenty five (25) tons per year or more and is located in Center Township of Marion County, shall submit a fugitive particulate matter emissions control plan within six (6) months following December 13, 1985. This source submitted a fugitive dust control plan on June 18, 2002. However, in utilizing AP-42 emission factors, and to the extent quantifiable, calculated fugitive particulate matter emissions do not exceed twenty five (25) tons per year or more (see TSD page 3 of 4). Cargill had never previously submitted a fugitive dust plan prior to, or on or after December 13, 1985. The applicability of a fugitive dust control plan requirement had not

been in any previous construction or operating permit condition. In addition, Cargill did not certify or claim that 326 IAC 6-5 was an applicable requirement in Compliance Data (CD) Forms in their Title V application. Therefore, this source is not subject to the provisions of 326 IAC 6-5-3 (Fugitive Particulate Matter Emission Limitations).

326 IAC 8 (Volatile Organic Compound Rules)

This grain storage and milling source commenced operation prior to 1980 and has the potential to emit VOC's of less than ten (10) tons per year. This source does not have significant Emission Units that perform operations for which a VOC subcategory under 326 IAC 8-2 through 326 IAC 8-13 exists.

This existing major source, as of January 1, 1980, does not have the potential to emit VOC's of one hundred (100) tons or greater per year. Therefore, this source is not subject to 326 IAC 8-6 (Organic Solvent Emission Limitations).

This existing major source, as of January 1, 1980, has the potential to emit VOC's of less than ten (10) tons per year and has not had any modification or new construction since January 1, 1980 that has the potential to emit twenty five (25) tons or more of VOC's per year. Therefore, 326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities) does not apply to this source and/or any emission unit at the source.

Therefore, source wide operations are not subject to the provisions of 326 IAC 8 (Volatile Organic Compound Rules).

326 IAC 11 (Emission Limitations for Specific Types of Operations)

There are no provisions under 326 IAC 11 for grain storage and milling operations. Therefore, this source is not subject to the provisions of 326 IAC 11 (Emission Limitations for Specific Types of Operations).

326 IAC 12 (New Source Performance Standards)

See discussion under ***Federal Rule Applicability*** section. This source is not subject to the provisions of 326 IAC 12 (New Source Performance Standards).

326 IAC 14 (Emission Standards for Hazardous Air Pollutants)

There are no provisions under 326 IAC 14 (and 40 CFR Part 61) for grain storage and milling operations. Therefore, this source is not subject to 326 IAC 14 (Emission Standards for Hazardous Air Pollutants).

326 IAC 17 (Public Records; Confidential Information; Confidentiality Agreements)

The City of Indianapolis Office of Environmental Services has historically held all information submitted by Cargill and all resultant permit issuances confidential per Cargill's longstanding request to hold this information confidential based on the information being a "trade secret."

A FESOP application was received from this source on February 23, 1996. At the time of application submittal, Cargill Dry Corn Ingredients, formerly Illinois Cereal Mills, submitted a cover letter requesting that process rates and flow rates that had been marked "Confidential" in the application continue to be held confidential. Cargill provided copies of a public viewing application that withheld process rates and air flow rates and submitted a separate complete "Confidential" application.

Cargill submitted an administratively complete Part 70 permit application for the purposes of this review on October 8th, 1997.

Cargill had stated in their submittal that process rates and air flow rates are trade secrets. However, a review of this information concludes that this information constitutes "emission data" under Indiana Code Section IC 13-14-11-1 and can therefore not be held confidential by IDEM, OAQ or OES. In addition, in the Federal Register notice of February 21, 1991, USEPA states that process rates and air flow rates constitute emission data and are a public record. Because IC 13-14-11-1 consists of a statutory mandate that "emission data" must be considered public records regardless of the trade secret status of the information, IDEM, OAQ and OES are under a statutory duty to release the

requested information to the public. Therefore, Cargill's confidentiality request was denied in a written letter to the source on October 28, 2002.

326 IAC 20 (Hazardous Air Pollutants)

There are no provisions under 326 IAC 20 (and 40 CFR Part 63) for grain storage and milling operations. Therefore, this source is not subject to 326 IAC 20 (Hazardous Air Pollutants).

State Rule Applicability - Individual Facilities

Cleaver Brooks Boiler #1 identified as Emission Unit ID 19

326 IAC 6-1-12 (Nonattainment Area Limitations: Marion County)

326 IAC 6-1-12 was amended for Cargill on July 1st, 2000 in the Indiana Register, Volume 23, Number 10. The revision became effective thirty (30) days after filing with the Indiana Secretary of State. The revision from 0.7 tons per year to 1.0 tons per year of particulate matter was performed to allow the Cleaver Brooks boiler to operate year round on natural gas.

Pursuant to 326 IAC 6-1-12 (Nonattainment Area Limitations: Marion County), particulate matter emissions from the Cleaver Brooks Boiler #1 identified as Emission Unit ID 19 are limited to 0.014 pounds per million Btu and 1.0 tons per year.

Utilizing AP-42 emission factors of 7.6 pounds of particulate matter per million cubic foot of exhaust for natural gas and 2.0 pounds of particulate matter per 1000 gallons of distillate oil fired, the boiler is in compliance with the short term allowable emission rate of 0.014 pounds per million Btu of heat input.

7.6 #'s PM/MMCF x MMCF/ 10^6 MMCF x CF/1000 Btu x 10^6 Btu/MMCF =	0.008 #'s PM/MMBtu
2.0 #'s PM/kgal x gal/140,000 Btu x 10^6 Btu/MMBtu x kgal/10^3 gal =	0.014 #'s PM/MMBtu

However, the potential to emit particulate matter (PM) exceeds 1.0 ton per year and the unit has no add on air pollution control equipment. Therefore, fuel use restrictions and/or fuel use equivalencies need to be set in order to limit PM emissions to less than 1.0 ton of particulate matter emissions per year as follows (see TSD Appendix A page 1 of 4):

Fuel use limitations for natural gas combustion (by itself with no other fuel burned) in Emission Unit ID 19 shall not exceed 263.15 mmcf per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is equivalent to 1.0 ton per year of PM.

Distillate fuel combustion (by itself with no other fuel burned) in Emission Unit ID 19 shall not exceed 1000 kgal per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is equivalent to 1.0 ton per year of PM.

For the purposes of determining compliance, every 1000 gallons (1 kgal) of distillate fuel consumption is equivalent to 0.26 mmcf of natural gas consumption based on PM emissions. This usage limit is required to limit the potential to emit PM to less than 1.0 tons per year.

326 IAC 7 (Sulfur Dioxide Rules)

Pursuant to 326 IAC 7 (Sulfur Dioxide Rules), all facilities with a potential to emit twenty five (25.0) tons or more per year of SO_2 or ten (10) or more pounds per hour shall comply with the limitations in 326 IAC 7-1.1-2. The Cleaver Brooks Boiler 19 identified as Emission Unit ID 19 has potential to emit in excess of twenty five (25.0) tons per year (see TSD Appendix A page 1 of 4) and is therefore limited to five tenths (0.5) pound per million Btu for distillate oil combustion. At an emission factor of 142(S) pounds of SO_2 per 1000 gallons of distillate oil fired and a distillate oil sulfur content of no greater than 0.5%, the boiler is in compliance with the short term allowable emission rate.

142(0.5) #'s SO_2/kgal x kgal/1000 gal x gal/140,000 Btu x 10^6 Btu/MMBtu =	0.5 #'s SO_2/MMBtu

Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated using a calendar month average sulfur dioxide emission rate in pounds per million Btu. Compliance with 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations), shall be determined utilizing one of the following options.

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths percent (0.5) pounds per million Btu heat input by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a certification;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

<u>Emission Unit ID D-20 (Grain Receiving Operations) and elevator headhouses, identified as Emission Unit ID D-11 and D-14</u>

326 IAC 6-1-2(d) (Nonattainment Area Limitations)

This grain elevator and milling source, having a permanent grain storage capacity in excess of 1.0 million bushels, commenced operation prior to January 13, 1977 and is therefore subject to the provisions of 326 IAC 6-1-2(d) which state:

(a) No owner or operator shall cause to be discharged into the atmosphere form any affected facility except a grain dryer any process emission unless such emissions are limited to a particulate matter content of no greater than 0.07 gram per dry standard cubic meter (dscm) (0.03 grain per dry standard cubic foot (dscf)) for said facilities which construction or modification commenced prior to January 13, 1977.

(b) Grain Elevators subject to this subdivision shall provide for good housekeeping and good maintenance procedures. Good housekeeping and maintenance is defined as those practices which would be followed by a prudent management in controlling, regulating and maintaining clean and safe conditions of buildings, conditions and grounds. In particular these practices are required to minimize the opportunity for particulate matter to become airborne and leave the property.

(A) Good housekeeping practices conducted in the following areas or operations:

(i) Areas to be swept and maintained clean in appearance shall include at a minimum: general grounds, yard and other open areas; floor decks, hopper areas, loading areas, dust collectors, and all such areas of dust or waste concentrations; and grain driers with respect to accumulated particulate matter.

(ii) Cleanings or other collected waste material shall be handled and disposed of in such a manner that the area does not generate fugitive dust.

(iii) Dust from driveway, access roads, and other areas of travel be controlled.

(iv) Accidental spills and other accumulations shall be cleaned up as soon as

possible but no later than completion of the day's operation.

(B) Good equipment maintenance will be those procedures which eliminate or minimize emissions from equipment or a system caused by:

(i) Malfunctions.
(ii) Breakdowns.
(iii) Improper adjustments.
(iv) Operation above rated or designed capacity.
(v) Not following designed operating specifications.
(vi) Lack of good preventive maintenance care.
(vii) Lack of critical and proper spare replacement parts on hand.
(viii) Lack of properly trained and experienced personnel.

(C) To ensure the above good housekeeping and maintenance procedures, emissions from the affected areas, operations, equipment and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

As a result, Emission Unit ID D-20 has an applicable PM limitation of 0.03 grains per dry standard cubic foot of exhaust air (see discussion below under 326 IAC 6-1-12 for D-11 and D-14). Emission Unit ID D-20, D-11 and D-14 each have a twenty percent (20%) opacity limit.

The most recent performance stack test for particulate matter emissions (PM) from Emission Unit ID D-20 was on July 8, 1993 with a resultant three run average PM emission rate of 0.0027 grains per dry standard cubic foot and 0.19 pounds per hour.

326 IAC 6-1-12 (Nonattainment Area Limitations: Marion County)

326 IAC 6-1-12 was amended for Cargill on July 1st, 2000 in the Indiana Register, Volume 23, Number 10. The revision became effective thirty (30) days after filing with the Indiana Secretary of State. Emission Unit ID D-14 allowable long term particulate matter emissions of 6.3 tons per year were further limited to 6.0 tons per year by way of the revision in order to increase the ton per year limit for the Cleaver Brooks Boiler #1, Emission Unit ID 19, from 0.7 tons per year to 1.0 tons per year. Pursuant to 326 IAC 6-1-12 (Nonattainment Area Limitations: Marion County), particulate matter emissions are limited as follows:

Emission Unit ID	NEDS Point Input ID	Description	gr/dscf	exhaust air flow rate	pounds PM per hour *	tons per year
D-11	15	Headhouse Suction	0.03	5395	1.39 (a)	3.1
D-14	18	Headhouse Suction	0.03	7800	2.01 (a)	6.0

* (a) There are no pounds per hour emission rates pursuant to 326 IAC 6-1-12. Pound per hour rates represent equivalent emission rates and/or rates previously established in Certificate of Operation 0020-01 through 0020-29, issued on October 8th, 1991.

Potential to emit in tons per year exceeds the applicable tons per year limit under 326 IAC 6-1-12 for Emission Unit ID D-11 and D-14 (see TSD Appendix A page 2 of 4). In utilizing the emission factor(s), maximum process rate and control device efficiency, the controlled ton per year emission rate is less than the allowable rate in tons per year pursuant to 326 IAC 6-1-12. An equivalent short term emission rate must be established in order to equate grains per dry standard cubic foot of exhaust air to an hourly mass emission rate and there must be permit conditions relating to proper operation of the control device(s).

Emission Unit D-11

0.061 lbs PM/ton x 200 tons/hr x 8760 hrs/yr x ton/2000 lbs x (1 - .99 control eff.) = 0.53 tons/yr

0.03 gr/dscf x 5395 dscf/min x 60 min/hr x 1 lb/7000 gr = 1.39 pounds per hour

Emission Unit D-14

0.061 lbs PM/ton x 200 tons/hr x 8760 hrs/yr x ton/2000 lbs x (1 - .99 control eff.) = 0.53 tons/yr

0.03 gr/dscf x 7800 dscf/min x 60 min/hr x 1 lb/7000 gr = 2.01 pounds per hour

The cyclones and/or baghouses for particulate matter control shall be in operation at all times D-11, D-14 and D-20 are in operation in order to comply with the PM limits. Therefore, these conditions limit the PTE of PM to less than the applicable emission limit pursuant to 326 IAC 6-1-12.

The most recent performance stack test for particulate matter emissions (PM) from Emission Unit ID D-14 was on March 10, 1986 with a resultant three run average PM emission rate of 0.002 grains per dry standard cubic foot of exhaust with an hourly emission rate not being reported.

Emission Unit ID D-6 (New Mill Dryer), D-7 (New Mill Dryer), D-8 (New Mill Cooler), D-15 (Oil Mill Dust System)

326 IAC 6-1-2(d) (Nonattainment Area Limitations)

This grain elevator and milling source, having a permanent grain storage capacity in excess of 1.0 million bushels, commenced operation prior to January 13, 1977 and is therefore subject to the provisions of 326 IAC 6-1-2(d) which state:

(a) No owner or operator shall cause to be discharged into the atmosphere form any affected facility except a grain dryer any process emission unless such emissions are limited to a particulate matter content of no greater than 0.07 gram per dry standard cubic meter (dscm) (0.03 grain per dry standard cubic foot (dscf)) for said facilities which construction or modification commenced prior to January 13, 1977.

(b) Grain Elevators subject to this subdivision shall provide for good housekeeping and good maintenance procedures. Good housekeeping and maintenance is defined as those practices which would be followed by a prudent management in controlling, regulating and maintaining clean and safe conditions of buildings, conditions and grounds. In particular these practices are required to minimize the opportunity for particulate matter to become airborne and leave the property.

(A) Good housekeeping practices conducted in the following areas or operations:

(i) Areas to be swept and maintained clean in appearance shall include at a minimum: general grounds, yard and other open areas; floor decks, hopper areas, loading areas, dust collectors, and all such areas of dust or waste concentrations; and grain driers with respect to accumulated particulate matter.

(ii) Cleanings or other collected waste material shall be handled and disposed of in such a manner that the area does not generate fugitive dust.

(iii) Dust from driveway, access roads, and other areas of travel be controlled.

(iv) Accidental spills and other accumulations shall be cleaned up as soon as possible but no later than completion of the day's operation.

(B) Good equipment maintenance will be those procedures which eliminate or minimize emissions from equipment or a system caused by:

(i) Malfunctions.
(ii) Breakdowns.
(iii) Improper adjustments.

(iv) Operation above rated or designed capacity.
(v) Not following designed operating specifications.
(vi) Lack of good preventive maintenance care.
(vii) Lack of critical and proper spare replacement parts on hand.
(viii) Lack of properly trained and experienced personnel.

(C) To ensure the above good housekeeping and maintenance procedures, emissions from the affected areas, operations, equipment and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

326 IAC 6-1-12 (Nonattainment Area Limitations: Marion County)

Pursuant to 326 IAC 6-1-12 (Nonattainment Area Limitations: Marion County), particulate matter emissions are limited as follows:

Emission Unit ID	NEDS Point Input ID	Description	gr/dscf	exhaust air flow rate	pounds per hour *	tons per year
D-6	07	New Mill Dryers	0.03	10789	2.77 (a)	3.0
	08		0.03			3.0
	09		0.03			3.0
	10		0.03			3.0
D-7	11	New Mill Dryers	0.03	8092	2.08 (a)	9.4
D-8	12	New Mill Coolers	0.03	10789	2.77 (a)	3.1
D-15	19	Oil Mill Dust	0.03	9400	2.42 (a)	5.9

* (a) There are no pounds per hour emission rates pursuant to 326 IAC 6-1-12. Pound per hour rates represent equivalent emission rates and/or the rates that were previously established in Certificate of Operation 0020-01 through 0020-29, issued on October 8th, 1991.

Potential to emit in tons per year exceeds the applicable tons per year limit under 326 IAC 6-1-12 for Emission Unit ID D-6, D-7, D-8 and D-15 (see TSD Appendix A page 2 of 4). In utilizing the emission factor(s), maximum process rate and control device efficiency, the controlled ton per year emission rate is less than the allowable rate in tons per year pursuant to 326 IAC 6-1-12. An equivalent short term emission rate must be established in order to equate grains per dry standard cubic foot of exhaust air to an hourly mass emission rate and there must be permit conditions relating to proper operation of the control device(s).

Emission Unit D-6

0.22 lbs PM/ton x 25 tons/hr x 8760 hrs/yr x ton/2000 lbs x (1 - 0.9 control eff) x (1-.0.9 control eff) = 0.24 tons/yr

0.03 gr/dscf x 10789 dscf/min x 60 min/hr x 1 lb/7000 gr = 2.77 pounds per hour

Emission Unit D-7

0.22 lbs PM/ton x 25 tons/hr x 8760 hrs/yr x ton/2000 lbs x (1 - 0.9 control eff) x (1-.0.9 control eff) = 0.24 tons/yr

0.03 gr/dscf x 8092 dscf/min x 60 min/hr x 1 lb/7000 gr = 2.08 pounds per hour

Emission Unit D-8

0.22 lbs PM/ton x 50 tons/hr x 8760 hrs/yr x ton/2000 lbs x (1 - 0.9 control eff) x (1-.0.9 control eff) = 0.24 tons/yr

0.03 gr/dscf x 10789 dscf/min x 60 min/hr x 1 lb/7000 gr = 2.77 pounds per hour

Emission Unit D-15

0.18 lbs PM/ton x 1.5 tons/hr x 8760 hrs/yr x ton/2000 lbs x (1 - 0.9 control eff) x (1-.0.9 control eff) = 0.01 tons/yr

0.03 gr/dscf x 9400 dscf/min x 60 min/hr x 1 lb/7000 gr = 2.42 pounds per hour

The cyclones for particulate matter control shall be in operation at all times D-6, D-7, D-8 and D-15 are in operation in order to comply with the PM limits. Therefore, these conditions limit the PTE of PM to less than the applicable emission limit pursuant to 326 IAC 6-1-12.

The most recent performance stack test for particulate matter emissions (PM) from Emission Unit ID D-15 was on July 8, 1993 with a resultant three run average PM emission rate of 0.005 grains per dry standard cubic foot of exhaust an hourly emission rate of 0.42 pounds per hour.

Emission Unit ID D-15A (Masa "A" System) and Emission Unit ID D-15B (Masa "B" System)

Installation Permit 9200020-01, 326 IAC 6-1-2(a) (Nonattainment Area Limitations) and 326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to Installation Permit 920020-01 issued November 13, 1992, particulate matter emissions from corn products drying and cooling operations, Masa "A" and "B" systems, identified as D-15A, and D-15B each shall not exceed 0.02 gr/dscf and 9.6 tons per year. At an exhaust air flow rate of 13500 dscfm, this is equivalent to 2.2 pounds per hour. In the report entitled '1999 Air Emissions Inventory Report for Illinois Cereal Mills, Indianapolis, Indiana', Cargill stated that the exhaust air flow rate for each unit was 10000 cfm.

Compliance with the short term allowable emission rate of 0.02 gr/dscf demonstrates compliance with the allowable 326 IAC 6-1-2(a) (Nonattainment Area Limitations) emission rate of 0.03 gr/dscf.

The AP-42 Table 9.9.1-1 emission factor of 0.22 pounds PM per ton of corn product dried at a process rate of 6.5 tons per hour yields a potential emission rate less than the restricted allowable rate of 9.6 tons per year (see below). Imposing an annual throughput limit in order to demonstrate compliance with the ton per year limit set in Condition 3 of Installation Permit 920020-01 would result in a limited throughput rate that is higher than maximum capacity. Therefore, Emission Unit ID's D-15A and D-15B allowable PM ton per year emission rate of 9.6 tons per year for each unit established in Installation Permit 9200020-01 is not being incorporated in to the proposed Title V permit.

Combined uncontrolled potential to emit PM and/or PM-10 from these operations does not exceed the major modification thresholds under 326 IAC 2-2 (Prevention of Significant Deterioration) of twenty five (25) tons per year of PM or fifteen (15.0) tons per year of PM10 (see TSD Appendix A page 2 of 4 and below).

D-15A	6.5 tons/hr x 0.22 pounds/ton x 8760/2000 =	6.26 tons of PM/yr
D-15B	6.5 tons/hr x 0.22 pounds/ton x 8760/2000 =	6.26 tons of PM/yr
		12.52 tons PM/yr
	12.52 tons PM/yr x 0.25 tons PM10/ton PM =	3.13 tons PM10/yr

However, uncontrolled PM emissions exceed 0.02 gr/dscf (6.5 tons/hr x 0.22 pounds PM/ton x hr/60 min x min/10000 dscf x 7000 gr/pound = 0.02 gr/dscf). Therefore, add on control is necessary to demonstrate compliance with 326 IAC 6-1-2(a) and Installation Permit 920020-01.

In utilizing the emission factor(s), maximum process rate and control device efficiency, the controlled

ton per year emission rate does not exceed the major modification thresholds under 326 IAC 2-2 (Prevention of Significant Deterioration) of twenty five (25) tons of PM or fifteen (15.0) tons of PM10. An equivalent short term emission rate must be established in order to equate grains per dry standard cubic foot of exhaust air to an hourly mass emission rate and there must be permit conditions relating to proper operation of the control device(s).

Emission Unit D-15A

0.22 lbs PM/ton x 6.5 tons/hr x 8760 hrs/yr x ton/2000 lbs x (1 - 0.9 control eff) x (1-.0.9 control eff) = 0.06 tons PM/yr (0.015 tons PM10/yr @ 25% PM = PM10)

0.02 gr/dscf x 10000 dscf/min x 60 min/hr x 1 lb/7000 gr = 1.71 pounds per hour

Emission Unit D-15B

0.22 lbs PM/ton x 6.5 tons/hr x 8760 hrs/yr x ton/2000 lbs x (1 - 0.9 control eff) x (1-.0.9 control eff) = 0.06 tons PM/yr (0.015 tons PM10/yr @ 25% PM = PM10)

0.02 gr/dscf x 10000 dscf/min x 60 min/hr x 1 lb/7000 gr = 1.71 pounds per hour

At an exhaust air flow rate of 10000 cfm for each unit, 0.02 gr/dscf is equivalent to 1.71 pounds of PM per hour.

Installation Permit 9200020-01 did not require performance stack testing. There have been no performance stack test for particulate matter emissions (PM) for Emission Unit ID D-15A and/or D-15B.

The cyclones for particulate matter control shall be in operation at all times D-15A and D-15B are in operation in order to comply with the PM and PM10 limits. Therefore, these conditions limit the PTE of PM to less than the applicable emission limit pursuant to 326 IAC 6-1-2(a) and demonstrate compliance with 326 IAC 2-2 (Prevention of Significant Deterioration) and Operation Condition Number 3 of Installation Permit 920020-01 issued November 13, 1992.

Emission Unit ID D-50 (Masa Hammermill Dust System)

This existing emission unit that had previously vented indoors and that had never been previously permitted is now being identified as Emission Unit ID D-50 (Masa Hammermill Dust System). Cargill submitted written letters on March 10, 1999 and on June 28, 1999 seeking an exemption status for redirecting the vents to exhaust to the outside air. However, this unit has the potential to emit PM in excess of twenty five (25) tons per year and PM10 in excess of fifteen (15) tons per year and is, therefore, not an insignificant activity (see TSD Appendix A page 2 of 4).

326 IAC 6-1-2(a) (Nonattainment Area Limitations) and 326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Limitations), sources or facilities located in Marion County which have the potential to emit greater than one hundred (100) tons per year of particulate matter or that have actual emissions greater than ten (10) tons per year and are not otherwise limited by 326 IAC 6-1-2(d) or 326 IAC 6-1-12 shall not exceed three hundredth (0.03) grains per dry standard cubic foot of exhaust air. This emission unit is not otherwise limited by 326 IAC 6-1-2(d) or specifically identified in 326 IAC 6-1-12 (Nonattainment Area Limitations: Marion County).

This unit was constructed after August 7, 1977 and, therefore, is subject to 326 IAC 2-2 applicability. This Emission Unit is a significant emission unit (see TSD Appendix A page 2 of 4). Actual PM10 emissions have not exceeded the major modification threshold. As a result, this source will be limited to less than fifteen (15) tons per year of PM10 emissions and less than twenty five (25) tons of PM emissions such that 326 IAC 2-2 does not apply. An equivalent hourly mass emission rate for these units is necessary to equate a grain loading rate to an hourly mass emission rate. At an exhaust air flow rate of 10000 dscfm, 0.03 gr/dscf of exhaust air is equivalent to 2.57 pounds of PM per hour and 0.64 pounds of PM10 per hour (pursuant to AP-42 Table 9.9.1-1 PM10 is 25% of PM).

Compliance with the short term allowable emission rate of 0.03 gr/dscf demonstrates compliance with the allowable 326 IAC 6-1-2(a) (Nonattainment Area Limitations) emission rate of 0.03 gr/dscf. Compliance with the short term allowable emission rate of 0.03 gr/dscf and 2.57 pounds of PM per hour and 0.64 pounds of PM10 limits PM and PM10 emissions to less than 25 and 15 tons per twelve (12) consecutive month period such that 326 IAC 2-2 does not apply.

Add on control equipment for this unit is necessary to determine compliance with 326 IAC 6-1-2(a) and 326 IAC 2-2 and there must be permit conditions relating to proper operation of the control device(s) (see below for Emission Unit D-50) in order to comply with the PM limits and PM10 limits.

15 tons/hr x 1.2 pounds PM/ton x hr/60 min x min/10000 dscfm x 7000 gr/pound = 0.21 gr/dscf uncontrolled

0.21 gr/dscf x (1- 0.99 control eff) = 0.002 gr/dscf controlled

There have been no recent performance stack tests for particulate matter emissions (PM) from Emission Unit ID D-50.

The baghouse for particulate matter control shall be in operation at all times D-50 is in operation in order to comply with the PM limits and PM10 limits. Therefore, these conditions limit PM emissions to less than the applicable emission limit pursuant to 326 IAC 6-1-2(a) and limit PM and PM10 emissions to less than twenty five (25) tons per year and fifteen (15) tons per year, respectively, such that 326 IAC 2-2 does not apply.

Emission Unit ID D-5 (Flaking Grit Drying)

Construction Permit 970020-01, 326 IAC 6-1-2(a) (Nonattainment Area Limitations) and 326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to Construction Permit 970020-01 issued June 17, 1997, PM emissions from Emission Unit ID D-5, D-50, D-51 and D-52 each shall not exceed 0.015 gr/dscf and shall not exceed a combined total of 23.55 tons of PM per rolling twelve (12) consecutive month period. The Construction Permit review determined that the PM-10 emission rate was, approximately, 25% of the controlled and/or uncontrolled PM emission rate (see Interim Section AP-42 Table 9.9.1-1 (11/95) and AP-42 Table 9.9.1-1 (5/98)) and, as a result, PM-10 was not enforceably limited to less than 15 tons per year such that 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) did not apply.

Compliance with the short term allowable emission rate of 0.015 gr/dscf demonstrates compliance with the allowable 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations: Specified) emission rate of 0.03 gr/dscf and makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) not applicable.

However, Emission Unit ID D-50, D-51 and D-52 were not constructed. These units, when combined with Emission Unit ID D-5, had the potential to emit PM enforceably limited by Operation Condition Number 10 to 23.55 tons per year such that 326 IAC 2-3 (Emissions Offset) did not apply. The Construction Permit 970020-01 issued July 21, 1997, did not enforceably limit or address PM10 emissions as PM10 emissions were deemed to be twenty five percent (25%) of PM emissions.

The potential to emit PM and PM10 from Emission Unit ID D-5 was based on the AP-42 interim emission factor of 0.825 pounds of PM per ton of product dried (0.33 x a dustiness ratio of 2.5). The AP-42 Table 9.9.1-1 PM emission factor for grain products drying is 0.22 pounds of PM per ton of product dried. This emission factor, at a maximum process rate of 2.5 tons per hour, yields 0.55 pounds of PM per hour and 2.4 tons per year (see TSD Appendix A page 2 of 4). Pursuant to AP-42 Table 9.9.1-1, PM10 emissions are twenty five percent (25%) of PM emissions. As a result, the potential to emit PM and PM10 do not exceed the major modification threshold under 326 IAC 2-2 (Prevention of Significant Deterioration).

Since three of the units were not constructed and the remaining unit that was constructed does not yield potential to emit in excess of the major modification threshold of fifteen (15) tons per year of PM10 and/or twenty five (25) tons per year of PM, the PM emission cap of twenty three and fifty five

hundredths (23.55) tons per year is no longer necessary and will not be incorporated in to the proposed Title V Permit.

However, uncontrolled PM emissions equal 0.015 gr/dscf (2.5 tons/hr x 0.22 pounds PM/ton x hr/60 min x min/12000 dscf x 7000 gr/pound = 0.01 gr/dscf). In addition, Construction Permit 970020-01 Operation Condition Number 11 required that a baghouse be in operation at all times Emission Unit ID D-5 is in operation. Therefore, add on control is necessary to demonstrate compliance with 326 IAC 6-1-2(a) and Construction Permit 970020-01.

Emission Unit ID D-5 must meet the Operation Condition Number 10 limit of 0.015 grains per dry standard cubic foot of exhaust air. Emission Unit ID D-5 is controlled by a cyclone. An equivalent short term emission rate must be established in order to equate grains per dry standard cubic foot of exhaust to an hourly mass emission rate and there must be permit conditions relating to proper operation of the control device(s) in order to comply with the PM and PM10 limits.

0.22 lbs PM/ton x 2.5 tons/hr x 8760 hrs/yr x ton/2000 lbs (1 -0.9 control eff) = 0.24 tons PM/yr (0.06 tons PM10/yr @ 25% PM = PM10)

0.015 gr/dscf x 12000 dscf/min x 60 min/hr x 1 lb/7000 gr = 1.54 pounds per hour

At an exhaust air flow rate of 12000 cfm, 0.015 gr/dscf this is equivalent to 1.54 pounds per hour.

The cyclone for particulate matter control shall be in operation at all times D-5 is in operation in order to comply with the PM and PM10 limits. Therefore, these conditions limit PM and PM10 to less than the applicable emission limit pursuant to 326 IAC 6-1-2(a) and Construction Permit 970020-01 and demonstrate compliance with 326 IAC 2-2 (Prevention of Significant Deterioration).

<u>Emission Unit ID D-21, D-22, and D-23, (Grading system A); D-24, D-25, and D-26 (Grading system B); D-30 and D-31 (Germ Recovery System) and D-37 (Finished Products System)</u>

326 IAC 6-1-2(a) (Nonattainment Area Limitations)

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Limitations), sources or facilities located in Marion County which have the potential to emit greater than one hundred (100) tons per year of particulate matter or that have actual emissions greater than ten (10) tons per year and are not otherwise limited by 326 IAC 6-1-2(d) or 326 IAC 6-1-12 shall not exceed three hundredth (0.03) grains per dry standard cubic foot of exhaust air.

All of these units were constructed prior to August 7, 1977 and, therefore, predate 326 IAC 2-2 applicability. None of these units are specifically identified in 326 IAC 6-1-12 (Nonattainment Area Limitations: Marion County). Therefore, an equivalent mass emission rate for these units is not necessary.

However, add on control equipment for these units is necessary to determine compliance with 326 IAC 6-1-2(a) and there must be permit conditions relating to proper operation of the control device(s) (see below for Emission Unit D-25) in order to comply with the PM limits.

15 tons/hr x 0.27 pounds PM/ton x hr/60 min x min/6700 dscfm x 7000 gr/pound = 0.07 gr/dscf uncontrolled

0.07 gr/dscf x (1- 0.999 control eff) = 0.001 gr/dscf controlled

The most recent performance stack test for particulate matter emissions (PM) from Emission Unit ID D-30 was on July 8, 1993 with a resultant three run average PM emission rate of 0.009 grains per dry standard cubic foot of exhaust and an hourly emission rate of 0.32 pounds per hour.

The baghouses for particulate matter control shall be in operation at all times D-21, D-22, D-23, D-24, D-25, D-26, D-30 and D-31are in operation in order to comply with the PM limits. Therefore, these conditions limit PM to less than the applicable emission limit pursuant to 326 IAC 6-1-2(a).

D-52 (9th Floor Filter Reroute)

This existing emission unit that had previously vented indoors and that had never been previously permitted is now being identified as Emission Unit ID D-52 (9th Floor Filter Reroute). Cargill submitted written letters on March 10, 1999 and on June 28, 1999 seeking an exemption status for redirecting the vent to exhaust to the outside air. However, this unit has the potential to emit PM in excess of twenty five (25) tons per year and PM10 excess of fifteen (15) tons per year and is, therefore, not an insignificant activity (see TSD Appendix A page 2 of 4).

326 IAC 6-1-2(a) (Nonattainment Area Limitations) and 326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Limitations), sources or facilities located in Marion County which have the potential to emit greater than one hundred (100) tons per year of particulate matter or that have actual emissions greater than ten (10) tons per year and are not otherwise limited by 326 IAC 6-1-2(d) or 326 IAC 6-1-12 shall not exceed three hundredth (0.03) grains per dry standard cubic foot of exhaust air. This emission unit is not otherwise limited by 326 IAC 6-1-2(d) or specifically identified in 326 IAC 6-1-12 (Nonattainment Area Limitations: Marion County).

This unit was constructed after August 7, 1977 and is, therefore, subject to 326 IAC 2-2 applicability. This Emission Unit is a significant emission unit (see TSD Appendix A page 2 of 4). Actual PM10 emissions have not exceeded the major modification threshold. As a result, this source will be limited to less than fifteen (15) tons per year of PM10 emissions and less than twenty five (25) tons of PM emissions such that 326 IAC 2-2 does not apply. An equivalent hourly mass emission rate for these units is necessary to equate a grain loading rate to an hourly mass emission rate. At an exhaust air flow rate of 36000 dscfm, 0.015 gr/dscf of exhaust air is equivalent to 4.63 pounds of PM per hour and 1.15 pounds of PM10 per hour (pursuant to AP-42 Table 9.9.1-1 PM10 is 25% of PM).

Compliance with the short term allowable emission rate of 0.015 gr/dscf demonstrates compliance with the allowable 326 IAC 6-1-2(a) (Nonattainment Area Limitations) emission rate of 0.03 gr/dscf. Compliance with the short term allowable emission rate of 0.015 gr/dscf and 4.63 pounds of PM per hour and 1.15 pounds of PM10 limits PM and PM10 emissions to less than 25 and 15 tons per twelve (12) consecutive month period such that 326 IAC 2-2 does not apply.

Add on control equipment for these units is necessary to determine compliance with 326 IAC 6-1-2(a) and 326 IAC 2-2 and there must be permit conditions relating to proper operation of the control device(s) (see below for Emission Unit D-52) in order to comply with the PM limits and PM10 limits.

4.5 tons/hr x 0.27 pounds PM/ton x hr/60 min x min/36000 dscfm x 7000 gr/pound = 0.01 gr/dscf uncontrolled

0.01 gr/dscf x (1- 0.999 control eff) = 0.0001 gr/dscf controlled

There have been no recent performance stack test for particulate matter emissions (PM) from Emission Unit ID D-52.

The baghouse for particulate matter control shall be in operation at all times D-52 is in operation in order to comply with the PM limits and PM10 limits. Therefore, these conditions limit PM to less than the applicable emission limit pursuant to 326 IAC 6-1-2(a) and PM and PM10 to less than twenty five (25) tons per year and fifteen (15) tons per year such that 326 IAC 2-2 does not apply.

State Rule Applicability - Individual Facilities - Insignificant Activities:

Facilities having integral controls identified as Emission Unit ID identified as D-4 (Masa “B” Cooler); D-27 (Feed Hammermill Lift system); D-28 (Reduction System A) and D-29 (Reduction System B); D-32 (Coarse Grit Receiver); D-33 (Brewers Grit Receiver); Two (2) Flour Receivers, identified as D-34 and D-35; D-36 (Granulated Meal Receiver); D-38 (Soft Meal Receiver); D-39 (Reduction systems A and B blowers); D-40 (Germ Recovery System Blower); D-41 and D-42 (Two (2) Germ Recovery System Feed Blowers); D-54 (Joshi Dryer); and D-55 (Joshi Dry Product Transfer Exhaust)

326 IAC 6-1-2(a) (Nonattainment Area Limitations)

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Limitations), sources or facilities located in Marion County which have the potential to emit greater than one hundred (100) tons per year of particulate matter or that have actual emissions greater than ten (10) tons per year and are not otherwise limited by 326 IAC 6-1-2(d) or 326 IAC 6-1-12 shall not exceed three hundredth (0.03) grains per dry standard cubic foot of exhaust.

All of these units, except Emission Unit ID D-4, D-54 and D-55, were constructed prior to August 7, 1977 and, therefore, predate 326 IAC 2-2 applicability. None of these units are specifically identified in 326 IAC 6-1-12 (Nonattainment Area Limitations: Marion County). There have been no modifications to these units that would have then been subject to 326 IAC 2-2. In addition, D-4, D-27, D-28, D-29, D-32, D-33, D-34, D-35, D-36, D-38, D-39, D-40, D-41, D-42, D-54 and D-55 are deemed to have integral controls. The resultant potential to emit for all these units qualifies as an Insignificant Activity (see TSD Appendix A page 2 of 4). Therefore, an equivalent mass emission rate for these units is not necessary.

However, operating the integral control equipment for these units does demonstrate compliance with 326 IAC 6-1-2(a). There must be permit conditions relating to proper operation of the control device(s) (see example below for Emission Unit D-28).

12.5 tons/hr x 0.061 pounds PM/ton x hr/60 min x min/2470 dscfm x 7000 gr/pound (1 - 0.996 control eff)
= 0.0001 gr/dscf controlled

There have been no performance stack tests for particulate matter emissions (PM) for any of these emission units with integral controls.

The baghouses for particulate matter control shall be in operation at all times D-4, D-27, D-28, D-29, D-32, D-33, D-34, D-35, D-36, D-38, D-39, D-40, D-41, D-42, D-54 and D-55 are in operation in order to comply with the PM limit. Therefore, these conditions limit PM to less than the applicable emission limit pursuant to 326 IAC 6-1-2(a).

Railcar Load out of finished products, identified as Emission Unit ID D-43 (Flour Loadout), D-44, 44a, 45, 46, and 46A (Yellow Goods Loadout); and Finished Products Shipping and Handling Operations, including feed loadout identified as D-47

326 IAC 6-1-2(a) (Nonattainment Area Limitations)

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Limitations), sources or facilities located in Marion County which have the potential to emit greater than one hundred (100) tons per year of particulate matter or that have actual emissions greater than ten (10) tons per year and are not otherwise limited by 326 IAC 6-1-2(d) or 326 IAC 6-1-12 shall not exceed three hundredth (0.03) grains per dry standard cubic foot of exhaust air.

Flour loadout and yellow goods loadout are each controlled by spout extensions and loadout enclosures. Feed loadout is controlled by a spout extension only. These operations do not have an exhaust for which compliance with 326 IAC 6-1-2(a) can be demonstrated. The operations have maximum throughput capacities of 25 tons per hour, 26 tons per hour and 60 tons per hour, respectively. All of these units were constructed prior to August 7, 1977 and, therefore, predate 326 IAC 2-2 applicability. There have been no modifications to these units that would have then been subject to 326 IAC 2-2. The resultant potential to emit qualifies as an Insignificant Activity (see TSD Appendix A page 2 of 4). Therefore, an equivalent mass emission rate for these units is not necessary.

Miscellaneous Insignificant Activities:

(a) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. [326 IAC 6-1-2(a)]

(b) Corn Aspiration identified as Emission Unit ID D-48 and controlled by a baghouse exhausting at Stack/Vent D-48. Installed in 1995. [326 IAC 6-1-2(a)]

(c) Masa Cooker Steam Ventilation Unit identified as Emission Unit ID D-49 and controlled by a cyclone exhausting at Stack/Vent D-49. Installed in 1996. [326 IAC 6-1-2(a)]

(d) Raw Bran Bin Dust Filter identified as Emission Unit ID D-53 and controlled by a baghouse exhausting at Stack/Vent D-53. [326 IAC 6-1-2(a)]

(e) natural gas-fired heaters, each rated at less than 10 million Btu per hour; [326 IAC 6-1-2(a)]

(f) equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour; [326 IAC 6-1-2(a)]

(g) Brazing equipment, cutting torches, soldering equipment, and welding equipment, not resulting in the emission of HAPs; [326 IAC 6-1-2(a)]

(h) Cleaners and solvents having a vapor pressure equal to or less than 2 kiloPascals measured at 38 degrees Celsius (100 degrees Fahrenheit) or having a vapor pressure equal to or less than 0.7 kiloPascals measured at 20 degrees Celsius, the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months. [326 IAC 8-3-5(a) & (b)]

326 IAC 6-1-2(a) (Nonattainment Area Limitations)

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations: Specified), sources or facilities located in Marion County which have the potential to emit greater than one hundred (100) tons per year of particulate matter or that have actual emissions greater than ten (10) tons per year and are not otherwise limited by 326 IAC 6-1-2(d) or 326 IAC 6-1-12 shall not exceed three hundredth (0.03) grains per dry standard cubic foot of exhaust air.

There have been no performance stack tests for particulate matter emissions (PM) for any of these emission units.

The cyclones and/or baghouses for particulate matter control shall be in operation at all times these emission units are in operation in order to comply with the PM limit. Therefore, these conditions limit PM to less than the applicable emission limit pursuant to 326 IAC 6-1-2(a).

326 IAC 8-3-1(b) (Organic Solvent Degreasing Operations: Applicability)

Pursuant to 326 IAC 8-3-1(b) (Organic Solvent Degreasing Operations: Applicability), 326 IAC 8-3-5 (Volatile Organic Compound Rules: Cold Cleaner Degreaser Operation and Control) is applicable to organic solvent degreasing operations located in Marion County and existing as of July 1, 1990. Cargill has existing cold cleaning operations located in Marion County and existing as of July 1, 1990.

326 IAC 8-3-5 (Volatile Organic Compound Rules: Cold Cleaner Degreaser Operation and Control)

Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

Construction Permit 970020-01 Condition 7 required that Emission Unit ID D-52 (Joshi Tiger Dryer) be performance stack tested for PM emissions. However, this unit was never constructed. As a result, there is no longer a stack test requirement per Construction Permit 970020-01 Condition 7.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ and OES, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as

grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Compliance monitoring plans for demonstrating compliance are as follows under Rule 326 IAC 2-7-5(3) which requires all permitted sources to demonstrate that all emitting units are in continuos compliance with all "applicable requirements" as defined by 326 IAC 2-7-1(6). Compliance is demonstrated by taking sufficient measurements of emissions or operating parameters or by gathering other data.

Compliance Monitoring is required for all emitting units which emit PM, SO_2 or VOC with existing applicable requirements and:

(a) a NSPS or NESHAP applies; or
(b) the unit has a control device and allowable emissions exceed 10 pounds per hour; or
(c) The unit does not have a control and actual emissions exceed 25 tons per year; or
(d) the unit would have been subject to an applicable requirement if there was not a condition limiting the PTE.

Based on IDEM and OES's review compliance monitoring requirements applicable to this source are as follows:

1. The Cleaver Brooks Boiler # 1, identified as Emission Unit ID 19, has applicable compliance monitoring conditions as specified below:

   (a) Visible emission notations of Stack/Vent 1 stack exhaust shall be performed once per shift during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.

   (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

   (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

   (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

   (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

2. Grain receiving operations, identified as D-20, has applicable compliance monitoring conditions as specified below:

   (a) Visible emission notations of the grain receiving operations stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

   (b) For processes operated continuously, "normal" means those conditions prevailing,

or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Parametric Monitoring
The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the grain receiving operations, at least once per shift when the grain receiving operations is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES shall be calibrated at least once every six (6) months.

Baghouse Inspections
An inspection shall be performed each calender quarter of all bags controlling D-20 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

Broken or Failed Bag Detection
In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the

event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

3. Two (2) grain elevator headhouses, identified as D-11 and D-14, have applicable compliance monitoring conditions as specified below:

(a) Visible emission notations of the two (2) grain elevator headhouses stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Cyclone Inspections
An inspection shall be performed each calender quarter of all cyclones controlling headhouse operations when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

Cyclone Failure Detection
In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

4. New mill drying and cooling operations, identified as D-6 (New Mill Dryer), D-7 (New Mill Dryer), D-8 (New Mill Cooler) and D-15 (Oil Mill Dust System) has applicable compliance monitoring conditions as specified below:

(a) Visible emission notations of the drying and cooling operations stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during

that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Cyclone Inspections
An inspection shall be performed each calender quarter of all cyclones controlling grain drying and cooling operations when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

Cyclone Failure Detection
In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

5. Masa corn products drying operations, identified as D-15A (Masa “A” System) and D-15B (Masa “B” System) has applicable compliance monitoring conditions as specified below:

Visible Emissions Notations

(a) Visible emission notations of the drying operations stack exhaust(s) 7A and 7B shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Cyclone Inspections
An inspection shall be performed each calender quarter of all cyclones controlling corn products drying operations when venting to the atmosphere. A cyclone inspection shall be

performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

Cyclone Failure Detection
In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

6. Masa Hammermill Dust System identified as D-50, has applicable compliance monitoring provisions as specified below;

Visible Emissions Notations

(a) Visible emission notations of the Emission Unit D-50 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Parametric Monitoring
The Permittee shall record the total static pressure drop across the baghouse used in conjunction with flaking grit drying, at least once per shift when flaking grit drying is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES shall be calibrated at least once every six (6) months.

Baghouse Inspections
An inspection shall be performed each calender quarter of all bags controlling D-50 when

venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

Broken or Failed Bag Detection
In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

7. Flaking Grit Drying identified as D-5, has applicable compliance monitoring provisions as specified below;

Visible Emissions Notations
(a) Visible emission notations of the Emission Unit D-5 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Cyclone Inspections
An inspection shall be performed each calender quarter of all cyclones controlling Emission Unit D-5 operations when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

Cyclone Failure Detection
In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

8. Two (2) grading systems: Grading system A , with pneumatic conveyance system exhausts identified as D-21, D-22, and D-23, and Grading system B, with pneumatic conveyance system exhausts identified as D-24, D-25, and D-26, Germ Recovery System identified as D-30 and D-31 and Finished Products System identified as D-37, have applicable compliance monitoring conditions as specified below:

Visible Emissions Notations

(a) Visible emission notations of Stack/Vent 9, 10, 11, 12, 13, 14, 17, 18 and 24 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Parametric Monitoring
The Permittee shall record the total static pressure drop across the baghouse used in conjunction with D-21, D-22, D-23, D-24, D-25, D-26, D-30, D-31 and D-37, at least once per shift when in operation and when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a violation of this permit

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES shall be calibrated at least once every six (6) months.

Baghouse Inspections
An inspection shall be performed each calender quarter of all bags controlling D-21, D-22,

D-23, D-24, D-25, D-26, D-30, D-31 and D-37 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

Broken or Failed Bag Detection
In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

9. 9th Floor Filter Reroute identified as D-52, has applicable compliance monitoring provisions as specified below;

Visible Emissions Notations
(a) Visible emission notations of the Emission Unit D-52 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Parametric Monitoring
The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the 9th Floor Filter Reroute, at least once per shift when flaking grit drying is in operation when venting to the atmosphere. When for any one reading, the pressure

drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES shall be calibrated at least once every six (6) months.

Baghouse Inspections
An inspection shall be performed each calender quarter of all bags controlling D-52 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

Broken or Failed Bag Detection
In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouses and cyclones for these processes must operate properly to ensure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration), 326 IAC 6-1-2(a), 326 IAC 6-1-2(d), 326 IAC 6-1-12 and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this grain storage, handling and milling operation under a Standard Industrial Classification (SIC) Code of 2041 (Corn Handling and Processing) shall be subject to the conditions of the attached proposed Part 70 Permit No. **T097-5458-00020**.

APPENDIX A

Company Name: **Cargill Dry Corn Ingredients, Inc.**
Address, City IN Zip: **1730 West Michigan Street, Indianapolis, Indiana 46222-3898**

Part 70: **097-5458-00020**
Reviewer: MBC
Date: 08/12/00

Boiler 19 Heat Input Capacity	33.5	MMBtu/hr	S = Weight % Sulfur	0.5	

Potential Throughput for Boiler 19	2096.14	kgals/year	
	287.71	MMcf/year	

	Pollutant						
Emissions Factors	PM	PM-10	SO2	NOx	VOC	CO	Lead
Distillate Oil (lb/kgal) AP-42	2.0	1.0	71	20.0	0.56	5.0	5.00E-04
Natural Gas (lbs/MMcf) AP-42	7.6	7.6	0.6	100	5.5	84	5.00E-04

Boiler 19 (Cleaver Brooks Boiler)	PM	PM-10	SO2	NOx	VOC	CO	Lead
Potential Emissions (Distillate Fuel)	2.10	1.05	74.41	20.96	0.58	5.24	5.24E-04
Potential Emissions (Natural Gas)	1.09	1.09	0.09	14.39	0.79	12.08	7.19E-05

Boiler 19 (Cleaver Brooks Boiler)	PM	PM-10	SO2	NOx	VOC	CO	Lead
SIP Allowable Emissions in tons/yr (Distillate Oil)	1.00	1.00	35.50	10.00	0.28	2.50	0.00
SIP Allowable Emissions in tons/yr (Natural Gas)	1.00	1.00	0.08	13.16	0.72	11.05	0.00
Max:	1.00	1.00	35.50	13.16	0.72	11.05	0.00

Limited Throughput for Boiler 19	1000.00	kgals/year	Meets 0.014lb/MMBtu SIP Limit?	0.00745098	lb/MMBtu	
	263.16	MMcf/year		yes		
Distillate Fuel Oil Natural Gas Equivalence	0.263158	mmcf/kgal				

Methodology

Throughput Calculations: 1 kgal of No. 2 Fuel Oil has a heating value of 140 MMBtu, Natural Gas has a heating value of 1020 Btu/scf.

Emission Factors are from AP 42, Tables 1.3-1 and 1.3-2 (9/98) for Distillate Oil and AP-42, Tables 1.4-1,2,3, and 5 for Natural Gas

Emissions from Distillate Oil Combustion - Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Company Name: Cargill Dry Corn Ingredients, Inc.
Address, City IN Zip: 1730 West Michigan Street, Indianapolis, Indiana 46222-3898
Plant ID 097 00020
Part 70: 097-5458-00020

Reviewer: MBC
Date: 11/18/2002

Point Source Emissions

									Uncontrolled PTE		PTE After Integral Controls		Limits Under 6-1-2 or 6-1-12				
Area	Unit ID	S/V ID	Process Description	Throughput (Tons/Hr)	Control Description	Primary Control Efficiency	Secondary Control Efficiency	Integral Controls?	Significant	PM	PM10	PM	PM10	Applicable Limits	CFM	gr/dscf	lbs/hr	tons/yr
Corn Mill	D-6	2	New Mill Dryer	25	2 Cyclones	0.9	0.9	N	Y	24.09	6.02	24.09	6.02	0.03 gr/dscf, opacity 20%	10789	0.03	2.77	12.00
Corn Mill	D-7	3	New Mill Dryer	25	2 Cyclones	0.9	0.9	N	Y	24.09	6.02	24.09	6.02	0.03 gr/dscf, opacity 20%	8992	0.03	2.08	9.40
Corn Mill	D-8	4	New Mill Cooler	50	2 Cyclones	0.9	0.9	N	Y	48.18	12.05	48.18	12.05	0.03 gr/dscf, opacity 20%	10789	0.03	2.77	3.10
Grain Elevator	D-11	5	Elevator Headhouse	200	Cyclone	0.9998	0	N	Y	53.44	29.78	53.44	29.78	0.03 gr/dscf, opacity 20%	5395	0.03	1.39	3.10
Grain Elevator	D-14	6	Elevator Headhouse	200	Cyclone	0.9998	0	N	Y	53.44	29.78	53.44	29.78	0.03 gr/dscf, opacity 20%	7800	0.03	2.01	6.00
Oil Mill	D-15	7	Oil Mill Dust System	1.5	2 Cyclones	0.9	0.9	N	N	2.96	2.96	2.96	2.96	0.03 gr/dscf, opacity 20%	9400	0.03	2.08	5.90
Masa System	D-15A	7A	Masa "A" System	6.5	2 Cyclones	0.9	0.9	N	Y	6.26	1.57	6.26	1.57	0.02 gr/dscf, opacity 30%	10000	0.03	2.20	9.60
Masa System	D-15B	7B	Masa "B" System	6.5	2 Cyclones	0.9	0.9	N	Y	6.26	1.57	6.26	1.57	0.02 gr/dscf, opacity 30%	10000	0.03	2.20	9.60
Grain Elevator	D-20	8	Truck Dump System	200	Baghouse	0.9975	0	N	Y	30.66	6.83	30.66	6.83	0.03 gr/dscf, opacity 20%	9392	0.03	3.24	14.19
Corn Mill	D-21	9	Grading System A	7.5	Baghouse	0.9808	0	N	Y	59.13	59.13	59.13	59.13	0.03 gr/dscf, opacity 30%	6700	0.03	3.10	13.58
Corn Mill	D-22	10	Grading System A	15	Baghouse	0.9904	0	N	Y	118.26	118.26	118.26	118.26	0.03 gr/dscf, opacity 30%	6700	0.03	1.55	6.79
Corn Mill	D-23	11	Grading System A	7.5	Baghouse	0.9808	0	N	Y	59.13	59.13	59.13	59.13	0.03 gr/dscf, opacity 30%	6700	0.03	1.72	7.53
Corn Mill	D-24	12	Grading System B	7.5	Baghouse	0.9808	0	N	Y	59.13	59.13	59.13	59.13	0.03 gr/dscf, opacity 30%	6700	0.03	1.72	7.53
Corn Mill	D-25	13	Grading System B	15	Baghouse	0.9904	0	N	Y	118.26	118.26	118.26	118.26	0.03 gr/dscf, opacity 30%	6700	0.03	1.55	6.79
Corn Mill	D-26	14	Grading System B	7.5	Baghouse	0.9808	0	N	Y	59.13	59.13	59.13	59.13	0.03 gr/dscf, opacity 30%	6700	0.03	1.72	7.53
Feed System	D-27	27	Feed Hammermill lift	28	3 Baghouses in parallel	0.9931	0	Y	N	4.22	4.22	0.03	0.03	0.03 gr/dscf, opacity 30%	9000	0.03	2.08	0.07
Corn Mill	D-28	15	Reduction System A	12.5	Baghouse	0.9958	0	Y	N	1.16	1.16	0.00	0.00	0.03 gr/dscf, opacity 30%	2470	0.03	0.57	2.50
Corn Mill	D-29	16	Reduction System B	12.5	Baghouse	0.9958	0	Y	N	1.16	1.16	0.00	0.00	0.03 gr/dscf, opacity 30%	2470	0.03	0.57	2.50
Corn Mill	D-30	17	Germ Recovery System	5	Integral Cyclone + non integral baghouse	0.967	0	N	Y	8.91	4.96	8.91	4.96	0.03 gr/dscf, opacity 30%	3902	0.03	1.00	4.39
Corn Mill	D-31	18																
Corn Mill	D-32	19	Coarse Grit Reciever	6.25	Baghouse	0.9978	0	Y	N	1.66	1.66	0.00	0.00	0.03 gr/dscf, opacity 30%	3530	0.03	0.82	3.59
Corn Mill	D-33	20	Brewers Grit Reciever	6.25	Baghouse	0.9978	0	Y	N	1.66	1.66	0.00	0.00	0.03 gr/dscf, opacity 30%	3530	0.03	0.82	3.59
Corn Mill	D-34	21	Flour Reciever	5	Baghouse	0.9894	0	Y	N	1.16	1.16	0.01	0.01	0.03 gr/dscf, opacity 30%	2470	0.03	0.57	2.50
Corn Mill	D-35	22	Flour Reciever	5	Baghouse	0.9848	0	Y	N	1.16	1.16	0.02	0.02	0.03 gr/dscf, opacity 30%	3530	0.03	0.82	3.59
Corn Mill	D-36	23	Granulated Meal Reciever	5	Baghouse	0.9848	0	Y	N	1.66	1.66	0.03	0.03	0.03 gr/dscf, opacity 30%	3530	0.03	0.82	3.59
Corn Mill	D-37	24	Finished Product System	33	Baghouse	0.9912	0	N	Y	8.82	4.91	8.82	4.91	0.03 gr/dscf, opacity 30%	13400	0.03	3.45	15.09
Corn Mill	D-38	25	Soft Meal Reciever	5	Baghouse	0.9848	0	Y	N	1.66	1.66	0.03	0.03	0.03 gr/dscf, opacity 30%	3530	0.03	1.94	8.50
Corn Mill	D-39	26	Reduction System A&B Blowers	12	Baghouse	0.9907	0	Y	N	2.44	2.44	0.02	0.02	0.03 gr/dscf, opacity 20%	5200	0.03	1.94	0.06
Corn Mill	D-40	45	Germ Recovery System Blower	6	Baghouse	0.9875	0	Y	N	1.64	1.64	0.02	0.02	0.03 gr/dscf, opacity 30%	3500	0.03	1.94	8.50
Germ Recovery System	D-41	28	Feed Blower	8	4 Baghouses in parallel	0.9962	0	Y	N	0.66	0.66	0.00	0.00	0.03 gr/dscf, opacity 30%	1400	0.03	0.58	2.54
	D-42	29	Feed Blower	8	4 Baghouses in parallel	0.9962	0	Y	N	0.66	0.66	0.00	0.00	0.03 gr/dscf, opacity 30%	1400	0.03	0.58	2.54
Loadout	D-43	30	Railcar Loadout (Flour)	25	None			N	N	0.36	0.36	0.36	0.36	0.03 gr/dscf, opacity 30%	NA	0.03		
Loadout		D44, 44A, 45, 46,46A	Railcar Loadout (Yellow Goods)	26	None			N	N	0.38	0.38	0.38	0.38	0.03 gr/dscf, opacity 30%	NA	0.03		
Loadout	D-47	D47	Feed Loadout	60	None			N	N	0.9	0.9	0.9	0.9	0.03 gr/dscf, opacity 30%	NA	0.03		
Corn Mill	D-48	D-48	Corn Aspiration	55	Baghouse	0.9984	0	N	N	exempt issued	exempt issued	exempt issued	exempt issued	0.03 gr/dscf, opacity 30%	4000	0.03	1.03	4.51
Masa System	D-49	D-49	Masa Cooker Steam Vent. System	0.417	Cyclone	0.9	0	N	N	exempt issued	exempt issued	exempt issued	exempt issued	0.03 gr/dscf, opacity 30%	4500	0.03	1.16	5.07
Masa System	D-50	D-50	Masa Hammermill (2) Dust	15	Baghouse	0.999	0	N	Y	87.8	21.95	87.8	21.95	0.03 gr/dscf, opacity 30%	6700	0.03	1.72	87.80
Corn Mill	D-52	D-52	9th Floor Filter Reroute	4.5	Baghouse	0.999	0	N	Y	35.48	35.48	35.48	35.48	0.015 gr/dscf, opacity 30%	36000	0.03	0.01	35.48
Joshi System	D-53	D-53	Raw Bran Bin Dust Filter	2	Baghouse	0.999	0	N	N	0.13	1.27	0.13	1.27	0.03 gr/dscf, opacity 30%	400	0.03	0.10	0.45
Joshi System	D-55	D-55	Joshi 3 Finished Product Filter	2	Baghouse	0.999	0	Y	N	0.94	0.94	0.00	0.00	0.03 gr/dscf, opacity 30%	1000	0.03	0.03	0.13
	D-5	2	Flaking Grit Drying	2.5	Cyclones	0.9		N	N	2.41	0.6	2.41	0.60	0.015 gr/dscf, opacity 30%	12000	0.03	3.08	13.49
	D-4	D-4	Masa "B" Cooling	7.5	Filter receiver	0.999	0	Y	N	3.99	3.99	0.00	0.00	0.03 gr/dscf, opacity 30%	12000	0.03	3.08	13.49
Joshi System	D-54	D-54	Joshi 3 Dryer Filter Reciever	2	Baghouse	0.999	0	Y	N	2.82	2.82	0.00	0.00	0.03 gr/dscf, opacity 30%	7000	0.03	1.80	7.88
												867.8	640.6			Total	63.62	358.89

Other Point Sources

Process Description	Nox	CO	Sox	VOCs	HAPs
Fumigant Usage					7.2
Joshi Dryer System	0.88	1.31	0.01	0.14	
Total	0.88	1.31	0.01	0.14	7.2

green = integral control device
yellow = Insignificant Activity

PTE reported from "1999 Air Emissions Inventory Report" submitted May 16, 2000

Company Name: **Cargill Dry Corn Ingredients, Inc**
Address, City IN Zip: **1730 West Michigan Street, Indianapolis, Indiana 46222-3898**
Plant ID **097 00020**
Part 70: **097-5458-00020**
Reviewer: **MBC**
Date: **20-Mar-03**

Fugitive Emissions

Control Description	Throughput (Tons/Hr)	Throughput tons/yr	PM Emission Factor lbs/ton	Control Eff (%)	PM-10 Emission Factor lbs/ton	Control Eff (%)	PM PTE	PM-10 PTE
Spout Extension	25	5000	0.0033	none	0.0008	none	0.01	0.00
Spout Extension	26	227760	0.0033	none	0.0008	none	0.38	0.09
Spout Extension	60	120000	0.0033	none	0.0008	none	0.20	0.05
Three sided enclosure (D-20)	200	1752000	0.035	99.75	0.0078	99.75	0.77	0.17
						Total:	1.35	0.31

Emission factors are from AP-42 Tables 9.9.1 & 9.9.1-2 (5/98)
Emissions from D-20 = (emfac*(1-control eff)*throughput) / 2000)
Annual Throughput assumes plant bottlenecking per 7/10/00 Inventory report

Company Name: **Cargill Dry Corn Ingredients, Inc.**
Address, City IN Zip: **1730 West Michigan Street, Indianapolis, Indiana 46222-3898**
Plant ID **097 00020**
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Reviewer: MBC
Date: 20-Mar-03

Facility Description	PM	PM10	Nox	CO	SOx	VOCs	HAPs
Boiler	2.10	1.09	20.96	12.08	74.41	0.79	0.00
Point Sources	867.79	640.61					
Other Point Sources (Joshi dryer fuel combustion & fumigant)			0.88	1.31	0.01	0.14	7.20
Fugitives	1.35	0.31					
Total:	871.24	642.02	21.84	13.39	74.42	0.93	7.20